

We do not consent!

Talking Points for Preparing Public Comments re: DOE's "Consent-Based Siting" of Radioactive Waste Dumps

***Use one or more of the following as a starting point for preparing
your own public comments by DOE's July 31 deadline***

See the very end of this document for how to submit public comments

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

We do not consent to DOE rushing into 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.

We do not consent to "centralized interim storage" facilities becoming ***de facto permanent surface storage parking lot dumps*** for high-level radioactive waste.

We do not consent to "games" of radioactive Russian roulette, radioactive hot potato, and radioactive musical chairs being played, when it comes to high-risk, high-level radioactive waste shipments on the roads, rails, and waterways through most states.

We do not consent to the nonsense of shipping high-level radioactive waste to "centralized interim storage," when permanent disposal could well involve shipping those very same wastes, right back to, or through, where they came from in the first place, heading in the opposite direction.

We do not consent to the nuclear establishment's "return to sender" schemes with "centralized interim storage." Had the Private Fuel Storage, LLC (PFS) parking lot dump – its license for construction and operation at the Skull Valley Goshutes Indian Reservation in Utah rubber-stamped by the U.S. Nuclear Regulatory Commission (NRC) a decade ago – actually opened, this nonsensical multiplication of transport risks could have occurred. PFS's plan was to dump the wastes at Yucca Mountain, Nevada. But its Plan B, should Yucca not open, was to "return to sender." Yucca has been cancelled. Had the Maine Yankee nuclear power plant, for example, sent its wastes to PFS, they would have been "returned to sender." More than 50 containers

of high-risk, high-level radioactive waste, shipped *5,000 miles round-trip* through numerous states, accomplishing absolutely nothing.

We do not consent to DOE's oldest trick in the book, of trying to divide and conquer, by attempting to play "orphaned" waste communities off against the rest of us – many "stranded" waste communities have stated explicitly that DOE's *de facto* permanent parking lot dump shenanigans are done "not in our name." DOE's stated purpose for prioritizing "stranded" waste export to parking lot dumps – to free up decommissioned nuclear power plant sites for "unrestricted," productive "re-use," is a non-starter. Decommissioning regulations are so inadequate, supposedly "cleaned up" sites are still significantly contaminated with hazardous radioactivity, making re-use of those sites risky for current and future generations.

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.

We do not consent to "Floating Fukushimas." There are some 26 atomic reactors in the U.S. that lack direct rail access. Yet DOE has chosen the "mostly rail" shipping scenario of high-level radioactive wastes as its preferred policy. Rail shipping containers weigh more than 100 tons. These cannot go down the highways. They are designed to go down railways. But to get these giant, very heavy containers to the nearest railhead, either heavy haul trucks, or barges on waterways, would have to be used. Barges raise the specter of a high-level radioactive waste shipment sinking, with the potential for disastrous releases of high-level radioactive waste into drinking water supplies and fisheries, or even a nuclear chain reaction on the bottom of the surface waterway (there is enough fissile U-235 and Pu-239 present in high-level radioactive waste that, if a critical mass forms in the sinking disaster, and water infiltrates the container, a nuclear chain reaction could be initiated, worsening radioactivity releases to the water body, and making emergency response a suicide mission, given the fatal gamma doses coming off the chain reaction).

We do not consent to high-level radioactive waste shipments on the Great Lakes; one barge sinking could radioactively contaminate the drinking water supply for 40 million people in two countries – eight states in the U.S., and two provinces in Canada – as well as a large number of Native American First Nations. The Palisades reactor in southwest Michigan, and the Kewaunee and Point Beach nuclear power plants in Wisconsin, were revealed by DOE in 2002 to be potential barge shipment points of origin. The barges would ply the waters of Lake Michigan, headwaters for the rest of the Great Lakes downstream, and the direct drinking water supply for many millions of people, including the Chicago metro region.

We do not consent to high-level radioactive waste barge shipments from the Calvert Cliffs nuclear power plant in Maryland, to the Port of Baltimore on the Chesapeake Bay. A sinking could destroy decades of Bay restoration work in one fell swoop, putting countless watermen out of work forever, and wrecking the Bay's tourism and recreation industries, as well as its fragile, irreplaceable, vibrant, biologically diverse ecosystem.

We do not consent to high-level radioactive waste barge shipments from the Surry nuclear power plant in Virginia, to the Port of Norfolk on the James River. A sinking could ruin this historic river, and also impact the Chesapeake downstream.

We do not consent to Floating Fukushimas from the Salem/Hope Creek nuclear power plant in New Jersey traveling up the already badly polluted Delaware River to the Port of Wilmington.

We do not consent to Floating Fukushimas on the surface waters of New Jersey, New York, and Connecticut, surrounding the metropolitan New York City area, including: from New Jersey's Oyster Creek nuclear power plant, up the Jersey Shore, around Staten Island, New York, to the Port of Newark, New Jersey; from Indian Point nuclear power plant, down the Hudson River, past Manhattan, to the Port of Jersey City, New Jersey; and from the decommissioned Connecticut Yankee nuclear power plant site, down the Connecticut River, onto Long Island Sound, into the Port of New Haven, Connecticut. The very high security risks alone, of intentionally bringing ultra-hazardous high-level radioactive waste, into such close proximity to so many millions of people, is a non-starter.

We do not consent to Floating Fukushimas on Cape Cod Bay, Massachusetts Bay, and Boston Harbor, traveling from Pilgrim nuclear power plant to the Port of Boston.

We do not consent to Floating Fukushimas on the Mississippi River, traveling from the Grand Gulf nuclear power plant to the Port of Vicksburg in Mississippi.

We do not consent to Floating Fukushimas on the Tennessee River, traveling from the Browns Ferry nuclear power plant to Florence, Alabama.

We do not consent to Floating Fukushimas on the Missouri River, traveling from the Cooper nuclear power plant to the Port of Omaha in Nebraska.

We do not consent to Floating Fukushimas on the Pacific Coast, traveling from the Diablo Canyon nuclear power plant to Oxnard/Port of Hueneme in California.

We do not consent to Floating Fukushimas on south Florida's Atlantic Coast, traveling from St. Lucie nuclear power plant to Fort Lauderdale/Port of Everglades and/or from Turkey Point nuclear power plant to the Port of Miami.

We do not consent to Floating Fukushimas on any other surface waters in the U.S., whether they be fresh water drinking water supplies, or salt water fisheries.

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.

We do not consent to heavy haul trucks (monster truck in front and back, two hundred wheels on the trailer in between, traveling only 3 miles per hour) as an end run attempt to transport very heavy rail casks to the nearest railhead, while attempting to avoid controversial, high-risk barge shipments.

We do not consent to Mobile Chernobyls, or Dirty Bombs on Wheels, traveling by railway through most states in the country under DOE's "mostly rail" shipping scheme.

We do not consent to Mobile Chernobyls, Fukushima Freeways, or Dirty Bombs on Wheels, traveling by highway through most states in the country, even under DOE's "mostly [but not entirely] rail" shipping scheme. (Casks designed for "legal-weight truck" shipments, as they are called, are significantly smaller and less heavy than rail casks, and would travel on interstate highways, and connecting roadways.)

We do not consent to containers, in violation of quality assurance and quality control (QA/QC) standards, being used to ship high-level radioactive waste. Commonwealth Edison/Exelon whistleblower Oscar Shirani, and NRC Midwest Region dry cask storage inspector, Dr. Ross Landsman, revealed major QA/QC violations with Holtec casks, 15 years ago. They questioned the structural integrity of Holtec casks *sitting still, going zero miles per hour*, let alone at 60 mph -- or faster -- on the rail lines. NRC has never adequately addressed these QA violations, so we have to assume they have continued right up to the present. Holtec containers have received an NRC rubber-stamp permit not only for on-site storage at more than a third of U.S. reactors, but also for rail/barge transport. To make matters worse, Holtec is the lead partner in the scheme to establish a parking lot dump in New Mexico. (The Private Fuel Storage, LLC parking lot dump targeted at the Skull Valley Goshute Indian Reservation, NRC rubber-stamped but later stopped despite this, would have utilized 4,000 Holtec casks, containing 40,000 metric tons of irradiated nuclear fuel.) Holtec is not the only high-level radioactive waste container with

QA/QC failures, however. NAC (Nuclear Assurance Corp.), VSCs (Ventilated Storage Casks), TN NUHOMS (TransNuclear), and others have violated QA/QC standards, as well. In fact, cask QA violations run rampant across industry, enabled by NRC complicity and collusion.

We do not consent to DOE's and industry's cynical attempt to "railroad" the American public on high-risk, high-level radioactive waste transport, by invoking the U.S. Constitution's Interstate Commerce Clause, to ram Mobile Chernobyls down our throats, through our communities. For starters, radioactive waste is not a commodity. It is a forever-deadly poison, with nowhere to go, never belonged on our living planet to begin with. We must stop making it.

ENVIRONMENTAL INJUSTICE/RADIOACTIVE RACISM

We do not consent to the environmental injustice and radioactive racism of yet again targeting low-income Native American communities with the most hazardous substances ever created. From 1987 to 1992, DOE's Nuclear Waste Negotiator wrote to every one of the many hundreds of federally recognized Native American tribes in the U.S., offering relatively large (for the tribes, anyway) sums of money in exchange for them "just to consider" hosting high-level radioactive waste parking lot dumps (the amount of money was exceedingly small, as compared to DOE's annual budgets, and especially as compared to nuclear power industry profit margins). DOE's Nuclear Waste Negotiator focused on 60-some tribes in particular. Mescalero Apache in New Mexico, and Skull Valley Goshutes in Utah, went the furthest. But traditionals like Rufina Marie Laws and Joe Geronimo at Mescalero, and Margene Bullcreek and Sammy Blackbear at Skull Valley, blocked the parking lot dumps in the end, after fierce battles, that left very deep wounds in those communities, for which the nuclear establishment bears responsibility. This resistance was assisted by Grace Thorpe, who not only blocked the parking lot dump targeted at her own Sauk and Fox Reservation in Oklahoma, but assisted environmental allies at reservations across the country to do the same. President Obama honored Thorpe for her anti-dump work, 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. And yet, President Obama's own Blue Ribbon Commission on America's Nuclear Future, as well as his DOE, are yet again including Native American reservations on the target list for parking lot dumps. This most disturbing internal Obama administration contradiction has never been explained.

We do not consent to the targeting of nuclear power plant sites already heavily burdened with irradiated nuclear fuel to become parking lot dumps, importing other reactors' wastes. A study by Oak Ridge Nuclear Lab, for example, has singled out the Dresden nuclear power plant in Morris, IL as a top target for a parking lot dump. But Dresden is already heavily burdened with around a whopping 3,000 metric tons of irradiated nuclear fuel, in the storage pools at three atomic reactors,

in the “overflow parking” dry cask storage installations, as well as the immediately adjacent General Electric-Morris reprocessing facility “wet storage” pool.

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 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. The proposal to open a parking lot dump in Eddy-Lea Counties in extreme southeastern New Mexico, near the Waste Isolation Pilot Project, is a case in point. WIPP is the U.S. national dump-site, in a salt formation 2,000 feet below ground, for trans-uranic contaminated radioactive wastes from the U.S. nuclear weapons complex. Although DOE assured the public that WIPP could not possibly leak in the first 10,000 years, and would leak at most once in the first 200,000 years, WIPP suffered a trans-uranic radioactive waste leak to the environment in year 15 of its operations, on Valentine’s Day, 2014. Nearly two-dozen workers at the surface suffered inhalation doses of ultra-hazardous, alpha-emitting substances, including plutonium. Trans-uranics also fell out downwind, to be further distributed by wind and rain over time. The burst of a single barrel 2,000 feet underground caused the radioactivity release. The root cause of the burst was a chemical reaction due to the mixing of chemically reactive nitrates and lead in with the radioactive wastes, which sparked the ignition. The fire was sustained by the inclusion of organic (meaning fibrous, plant-based) *kitty litter*, meant to absorb liquids. The burst of the single barrel has already shut down WIPP for over two years. DOE estimates the recovery cost at \$500 million; the *L.A. Times* estimates one billion dollars.

We do not consent to a *de facto* permanent parking lot dump targeted at Waste Control Specialists, LLC (WCS) in Andrews County, Texas. WCS applied to NRC for a construction and operation license on April 28, 2016. WCS already dumps all categories of so-called “low” level radioactive waste – Class A, B, and C – into the ground, either directly above, or immediately adjacent to, the Ogallala Aquifer. The Ogallala Aquifer serves as a vital supply of drinking and irrigation water for numerous states on the Great Plains, from Texas to South Dakota. WCS effectively serves as a national dump-site for such radioactive wastes. (Several state environmental agency staffers resigned their career jobs in protest over the outrageous decision to allow WCS to open for “low” level radioactive waste dumping in the first place.) WCS also accepted many scores of barrels from Los Alamos Nuclear Lab in New Mexico, containing the same volatile mix as burst in the WIPP underground in 2014. Already, the potentially bursting barrels have sat out in the hot summer sun at WCS in 2014, 2015, and now 2016, with no end in sight. Heat fueling a chemical reaction, igniting combustibles, and pressure build-up, is the entire problem with the burst risk. If one or more barrels burst at WCS, into the open air of the surface environment, the releases of plutonium and other ultra-hazardous trans-uranic radioactive wastes could be significantly worse, in terms of

downwind and downstream fallout, than the 2014 WIPP release, which originated 2,000 feet below ground, and had to follow a long, circuitous path, through thousands of feet of horizontal burial caverns and tunnels, as well as thousands of feet of vertical ventilation shaft, to reach the surface environment, and fallout over a wide area downwind. The barrels at WCS are *at* the surface environment! WCS accepting these potentially explosive barrels in such a great big hurry in the first place, without even knowing the risks they were getting into, shows what a careless company it is. It cannot and should not be trusted to store high-level radioactive waste, not even temporarily (although “interim” is a deception – the storage would become very long term, perhaps even permanent).

A second company, Advanced Fuel Cycle Initiative (AFCI), is targeting another west TX county for *de facto* permanent storage as well: Culberson. Given the large Hispanic American population in the area, as well as low-income levels, Environmental Justice concerns are raised, yet again, by these proposed west TX parking lot dumps. Much the same can be said regarding the populations in southeastern New Mexico, surrounding the proposed parking lot dump there.

Another parking lot dump target – Savannah River Site (SRS), South Carolina – also raises red flags about disproportionate impacts on people of color and low-income communities. SRS is already a badly radioactively contaminated region, due to decades of nuclear weapons production, and other related nuclear activities (such as mixed oxide plutonium fuel storage and fabrication, civilian high-level radioactive waste reprocessing, etc.). But in addition, the area also “hosts” the adjacent Barnwell, SC “low” level radioactive waste dump – a national dump for decades on end, long leaking. To make matters even worse, the area “hosts” the largest – in terms of number of reactors – nuclear power plant in the U.S., Vogtle. Vogtle Units 1 and 2 have already operated for decades; Units 3 and 4 are currently under construction. The nearby community of Shell Bluff, Georgia is predominantly African American and low-income. Targeting the SRS area with a high-level radioactive waste parking lot dump would just compound the environmental injustice even worse.

HIGH-LEVEL RADIOACTIVE WASTE STORAGE POOLS

We do not consent to the nuclear power industry, with NRC’s blessing, keeping high-level radioactive waste at high-risk, high-density “wet” storage in waste pools, for years or decades into the future. NRC decommissioning regulations, for example, allow pool storage for as long as 60-years post reactor shutdown (so, if the reactor had operated for 60 years, as NRC has permitted time and again, that would mean a total of 120 years of pool storage; NRC is now actively considering allowing 80 years of operations at reactors, which would then add up to 140 years of pool storage.). Nuclear utilities seek to defer dry cask storage costs as far off into the future as possible, by maximizing pool storage for as long as possible. Pools are so densely-packed, they have approached operating reactor core densities. Especially

considering degradation of neutron absorbing structures (such as Boraflex panels) in the pools, this risks potentially deadly and disastrous nuclear chain reactions in the unshielded pool. But high-density storage also risks a sudden cooling water drain down, or a slower motion boil down. Either way, the worst case scenario would be a partial drain down, where irradiated nuclear fuel is partially exposed to air, with remaining pool water below blocking convection air currents, that would at least provide some (and perhaps still not enough) cooling to the overheating exposed irradiated nuclear fuel assemblies. Once exposed to air, the zirconium-clad fuel rods could reach ignition temperature within hours, initiating spontaneous combustion. The chemical reaction would turn exothermic, self-feeding, with the fire burning down the fuel rods, not unlike 4th of July sparklers. The pool would be unapproachable, due to lack of cooling water radiation shielding, with instantaneously deadly doses nearby. Thus, emergency responders would likely be blocked from intervening, making even suicide squad interventions ineffective. The radioactive Cesium-137 releases alone, to the environment, would be catastrophic, due to such a pool fire.

We do not consent to ongoing pool storage, due to pool leaks that, according to NRC in 2013, have already occurred at 13 pools across the U.S. This number can be expected to increase, with worsening age-related degradation at U.S. nuclear power plants. Such pool leaks harm soil, groundwater, surface water, and people and other living things downstream, up the food chain, and down the generations.

We do not consent to pools being dismantled during nuclear power plant decommissioning. Although pools should be off-loaded into hardened on-site storage ASAP (see below), and kept unloaded, the pool structures, systems, and components themselves should be left intact, maintained, and not dismantled or allowed to fall into disrepair. Keeping functional pools extant, albeit empty until needed, would provide an emergency location for failed cask to new replacement cask transfers of irradiated nuclear fuel, with needed radiation shielding. If pools are dismantled at decommissioning nuclear power plant sites (as has been the standard approach thus far), any cask-to-cask transfers would have to be done on an *ad hoc* basis, perhaps under a worsening emergency situation. There is no reason to paint ourselves into such a corner. Pools can be maintained to provide an emergency back-up transfer option. Although they should no longer be used for regular waste storage, as they are too risky.

NEED FOR HARDENED ON-SITE STORAGE (HOSS)

We do not consent to NRC's status quo, allowing nuclear utilities to store irradiated nuclear fuel for as long as 120 years in vulnerable storage pools, and to store high-level radioactive waste in vulnerable dry casks. Many hundreds of environmental, public interest, and social justice groups, representing all 50 states, have called for Hardened On-Site Storage (HOSS) for 15 years. HOSS calls for emptying of vulnerable storage pools into dry casks, but not into vulnerable status quo ones, as

is currently done. This out of the frying pan, into the fire approach is unacceptable and dangerous. Dry casks must be designed and built well, with rigorous QA standards, to last not decades, but centuries. Dry cask storage must be safeguarded against leaks, accidents, natural disasters, and intentional attacks. Such health, safety, security, and environmental protections are not fulfilled by current, vulnerable dry cask storage permitted by NRC.

We do not consent to abandonment of high-level radioactive waste on the shores of the Great Lakes, on the banks of rivers, on the ocean coasts, etc., where it is currently stored. Such abandonment would lead to catastrophic releases of hazardous radioactivity over time, into the drinking water supplies for countless millions of people, into major fisheries, etc. This is especially true under climate chaos scenarios, with extreme weather events at such locations, and rising sea levels, causing major flooding. Many of these very same sites are also vulnerable to earthquakes, tsunamis, and other natural disasters. As environmental groups have long advocated, high-level radioactive wastes should be stored as close to the point of origin as possible, as safely as possible. Certain sites are not appropriate for HOSS, just as they were not appropriate for reactors in the first place. Prairie Island, Minnesota, is a case in point, home to the Prairie Island Indian Community, which never granted its consent to the construction and operation of the two atomic reactors there, nor to the generation and storage of high-level radioactive waste, just hundreds of yards from their community. While wastes need to be relocated from Prairie Island to higher ground, out of the flood plain of the Mississippi River, this should be done in the immediate area, as close as possible, as safely as possible. This is no justification to launch a national Mobile Chernobyl/parking lot dump campaign, creating a whole new set of potentially catastrophic risks elsewhere. In fact, Prairie Island nuclear power plant's owner, Xcel Energy/Northern States Power, has been an infamous leader in such schemes, for decades, including the radioactively racist targeting of PFS at the Skull Valley Goshutes Indian Reservation in Utah.

We do not consent to NRC's science fiction fantasy of non-existent, unfunded "Dry Transfer Systems," and the absurd notion that these Dry Transfer Systems and dry cask storage installations, will be replaced, in their entirety, once every hundred years, whether the storage is at current nuclear power plant sites, or away-from-reactor locations (such as *de facto* permanent parking lot dumps). Dr. Mark Cooper of Vermont Law School has estimated that the first 200 years of irradiated nuclear fuel management in the U.S. – assuming a single repository, and a certain number of centralized interim storage sites – will already cost ratepayers, and/or taxpayers, \$210 to 350 billion – effectively doubling the cost of nuclear-generated electricity, if accounted for (which it never has been, till Dr. Cooper did the calculations on his own initiative, on behalf of an environmental coalition intervening in NRC's Nuclear Waste Confidence/Continued Storage of Spent Nuclear Fuel proceeding). But 200 years is a drop in the ocean, compared to the million years, or longer, high-level radioactive waste remains hazardous. We need to stop making it, by shutting down reactors and replacing them with energy efficiency and renewable sources, such as

wind power and solar photo-voltaic (PV). And we need to figure out how to keep the radioactive waste that already exists, isolated from the living environment, forevermore. As Arnie Gundersen, Chief Engineers of Fairewinds Associates, Inc., has put it: *“We all know that the wind doesn’t blow consistently and the sun doesn’t shine every day, but the nuclear industry would have you believe that humankind is smart enough to develop techniques to store nuclear waste for a quarter of a million years, but at the same time humankind is so dumb we can’t figure out a way to store solar electricity overnight. To me that doesn’t make sense.”*

Yucca Mountain

We do not consent to the proposed dumpsite for high-level radioactive waste at Yucca Mountain, Nevada. It was wisely cancelled and defunded by the Obama administration and DOE in 2010, as it should have been from the beginning, in the early 1980s. Obama and the Energy Secretaries serving under him declared Yucca “unworkable.” Unfolding what “unworkable” means would have to include that the site is not scientifically suitable. It is a very active earthquake zone. It is a volcanic zone. It is saturated with water underground. It has highly corrosive chemistry in the rock, which, combined with the thermal heat of the waste, and the surrounding moisture, would create the perfect storm for burial container failure in a relatively short period of time. If irradiated nuclear fuel were ever to be buried at Yucca, it would leak out massively over time. The catastrophic amounts of hazardous radioactivity would be carried by Yucca’s groundwater to points downstream, including the Amargosa Valley agricultural region, one of Nevada’s most productive, as well as Death Valley, home to the Timbisha Shoshone Nation.

Unworkable also means that Yucca is Western Shoshone Indian Nation land, by the “peace and friendship” Treaty of Ruby Valley of 1863. The Yucca dump is an unacceptable environmental justice violation.

Unworkable also means that Nevada does not consent to the dump. It never has. Yucca Mountain, Nevada was singled out as the only site in the U.S. for further consideration as a potential dump-site, by the “Screw Nevada bill” of 1987, as it is most commonly referred to. This amendment to the Nuclear Waste Policy Act of 1983 was orchestrated by such powerful state congressional delegations as Texas and Washington State – other Western targets, which also happened to hold the U.S. House Speakership, and U.S. House Majority Leadership. Conspiring with such Eastern states also New Hampshire, these states successfully got themselves off the short list for the country’s high-level radioactive waste dump, by “screwing Nevada.” This turned a science-based site search comparison, including regional equity (a dump in the West, but also one in the East, where the vast majority of atomic reactors are located to begin with), into a ram it down Nevada’s throat case of raw politics (Nevada had only one U.S. Representative in 1987; Texas and Washington, by comparison, had three dozen, and one dozen, respectively.) Despite this, the State

of Nevada has successfully fought tooth and nail, expressing its non-consent to the Yucca dump, for 30 years now.

The Yucca dump is a non-starter, and must be removed from any further consideration.

Nuclear Power and High-Level Radioactive Waste Generation

We do not consent to the generation of irradiated nuclear fuel in the first place. Both the Blue Ribbon Commission on America's Nuclear Future, and now DOE's ONE (Office of Nuclear Energy), have cynically framed the radioactive waste problem as a minor one, to be solved as expeditiously – and seemingly flippantly – as possible, so that nuclear power can go on its merry way, making ever more forever deadly high-level radioactive waste, for which there is still no safe, sound solution, and may never be. As Dr. Judy Johnsrud of Environmental Coalition on Nuclear Power put it, radioactive waste may well be “trans-solutional,” a problem we have created that is beyond our ability to solve. And as Beyond Nuclear board member Kay Drey has put it, the mountain of radioactive waste is now more than 70 years high, and we still don't know what to do with the first cupful.

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: ***Denver May 24; 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.]

For more information, please see:

<http://www.state.nv.us/nucwaste/trans.htm>

<http://www.nirs.org/radwaste/hlwtransport/mobilechernobyl.htm>

<http://www.nirs.org/fukushimafreeways/stopfukushimafreeways.htm>

<http://www.nirs.org/radwaste/atreactorstorage/atreactorhome.htm>

<http://www.nirs.org/radwaste/yucca/yuccahome.htm>

<http://www.nirs.org/radwaste/scullvalley/skullvalley.htm>

<http://www.nirs.org/radwaste/wasteconfidence.htm>

<http://www.nirs.org/radwaste//atreactorstorage/shiranielleg04.htm>

<http://www.nirs.org/radwaste/scullvalley/historynativecommunitiesnuclearwaste06142005.pdf>

<http://www.nirs.org/factsheets/nirsfctshdrycaskvulnerable.pdf>

<http://www.beyondnuclear.org/radioactive-waste/>

<http://www.beyondnuclear.org/centralized-storage/>

<http://www.beyondnuclear.org/on-site-storage/>

<http://www.beyondnuclear.org/waste-transportation/>

<http://www.beyondnuclear.org/yucca-mountain/>

<http://www.beyondnuclear.org/waste-transportation/2016/1/20/doe-undertaking-logistical-planning-for-shipment-of-stranded.html>

<http://www.beyondnuclear.org/home/2012/1/18/a-mountain-of-waste-70-years-high-and-no-solution-in-sight.html>

<http://neis.org/2012-conference/>

<https://sanonofresafety.files.wordpress.com/2011/11/doe-designedtoleak2016-05-3sos.pdf>

<http://nonuclearwasteaqui.org/>

http://ieer.org/wp/wp-content/uploads/2010/03/HOSS_PRINCIPLES_3-23-10x.pdf

<http://www.sric.org/nuclear/wippleak2014.php>

<http://www.indianz.com/News/2015/019111.asp>

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