



Beyond Nuclear
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To: The Honorable Elijah Cummings, Ranking Member, U.S. House Committee on Oversight & Government Reform; Hon. Stacey Plaskett, Ranking Member, Interior, Energy & Environment Subcommittee; the Hon. Jamie Raskin, Member, Interior, Energy & Environment Subcommittee

September 25, 2017

Dear Representatives Cummings, Plaskett, and Raskin,

I am writing, on behalf of our members and supporters in your districts, across Maryland, and nationwide, concerning tomorrow's hearing on "Examining America's Nuclear Waste Management and Storage," to be held by the Interior, Energy & Environment Subcommittee. Contrary to Rep. Shimkus's push, with his H.R. 3053, the Nuclear Waste Policy Amendments Act of 2017, this subject matter is not non-controversial – it is (and should be) among the most highly controversial, and high-risk, matters to come before Congress.

First and foremost, it is troubling that yet again, it seems the entire witness panel comes from a perspective that is very friendly to the nuclear power industry's agenda. No witnesses have been invited to testify, representing a public interest, environmental, environmental justice, or other similar perspective, critical of current targeting of Yucca Mountain, Nevada (for permanent disposal), and the Texas/New Mexico borderlands (for so-called "centralized interim storage facilities," *de facto* permanent parking lot dumps). The Yucca dump, and the Waste Control Specialists, LLC (Andrews County, TX), as well as Holtec/Eddy-Lea Energy Alliance (ELEA, NM), parking lot dumps, each are in violation of such basic tenets of highly radioactive waste management, storage, and disposal as consent-based siting, scientific suitability, and environmental justice. *(see P.S., below)* Please see our website sections for more information on these matters: <http://www.beyondnuclear.org/yucca-mountain/>; <http://www.beyondnuclear.org/centralized-storage/>.

Of particular concern to the vast majority of U.S. congressional districts across the country (see: <http://www.state.nv.us/nucwaste/news2017/115th%20Congressional%20Districts%207252017.pdf>), is the oft-ignored and neglected risk of shipping irradiated nuclear fuel, by road, rail, and/or waterway, to these targeted western dumps. A total of 44 states, plus the District of Columbia (see: <http://www.state.nv.us/nucwaste/news2017/State%20Maps.pdf>), as well as many major cities (see, for example: http://www.state.nv.us/nucwaste/news2017/pdf/Cities_Affected.pdf), would be impacted by road and rail shipments to Yucca; additional states would be impacted by barge shipments on surface waters (including, as but one example, the Chesapeake Bay; see: <http://www.beyondnuclear.org/waste-transportation/2017/6/29/potential-barge-routes-on-us-surface-waters-to-ship-high-lev.html>). Whether due to a severe accident (such as a high-speed crash, or a fall from a great height, into/onto unyielding surfaces; high-temperature, long-duration fires; long-duration, deep underwater submersion; etc.), or an intentional explosive/incendiary attack (see <https://web.archive.org/web/20080511182245/http://www.nirs.org/factsheets/nirsfcsthdrycaskvulnerable.pdf>, for info. on revelations of cask vulnerability, from the test firing of an anti-tank missile at the U.S. Army's Aberdeen Proving Ground in Maryland), such shipments represent potential Mobile Chernobyls, Floating Fukushimas, Dirty Bombs on Wheels, and Fukushima Freeways.

As but one example of the potential for radioactive catastrophe from such shipments, the July 2001 Howard Street Tunnel train fire beneath downtown Baltimore, is a cautionary tale. The State of Nevada, long forced to defend itself against “Screw Nevada” attempts to turn it into the country’s radioactive waste dump, against its will, without its consent, has long sought to educate the rest of the country to the risks of radioactive waste transportation. It commissioned a study of the Howard Street Tunnel fire. (See it posted here: <http://www.state.nv.us/nucwaste/news2001/nn11459.pdf>). It studied what would have happened, had irradiated nuclear fuel been aboard that train, instead of (or in addition to) the flammable and hazardous materials that did burn and leak out during the accident. The study assumed use of a Holtec shipping container, which just so happens to be the cask of choice of the current ELEA, New Mexico parking lot dump proposal.

The findings were shocking. The study found that the heat and duration of the fire would have breached the cask. If irradiated nuclear fuel had been aboard, inevitably scores of people would have later died, of latent cancer fatality, due to their initial exposures in just the first hours of the radioactivity releases. But if people continued to live in contaminated areas of Baltimore, around 1,500 people would later die of latent cancer fatality, after just one year’s worth of exposure to such contamination. A lifetime of exposure, over 50 years, would lead to around 30,000+ latent cancer fatalities. (See Table 1, Page 13.) As unthinkable as it is, that people would not be relocated away from such contamination, the nuclear power industry’s lobbyists have repeatedly sought to weaken radioactivity protections, in order to save money, and obscure radioactivity’s hazard from the unsuspecting public. All too often, they have succeeded, as at federal agencies charged with the protection of the public, but instead colluding in service to the industry’s bottom line and public relations interests. The Nuclear Regulatory Commission, EPA’s Office of Indoor Air and Radiation, etc., all too often do the industry’s bidding, rather than serve the public interest.

As Dr. Fred Dilger, a consultant to the State of Nevada Agency for Nuclear Projects, has recently documented, some 255 rail shipments of irradiated nuclear fuel, through four Maryland congressional districts (including towns such as Mount Rainier and Takoma Park) can be expected, under current targeting plans for the Yucca dump.

So too are shipments on the Chesapeake Bay (see: <https://www.nirs.org/wp-content/uploads/factsheets/mdbargefactsheet92804.pdf>). The sinking, and radioactivity release, from single breached barge shipment (of more than 300 proposed) of irradiated nuclear fuel, could spell catastrophe for the Chesapeake, its recreation and tourism industries, fisheries, etc. Water leaking into a breached cask on the bottom of the Chesapeake could serve as a neutron moderator, spark a nuclear chain reaction in the fissile Uranium-235 and Plutonium-239, if a critical mass were to form in the accident. Such a chain reaction would make emergency response a suicide mission, given the deadly gamma and neutron radiation emitted. It would also dramatically worsen the hazardous radioactive pollution released.

Many hundreds of barge shipments on the Atlantic Ocean are also proposed (see: <https://www.nirs.org/wp-content/uploads/factsheets/flbargefactsheet92804.pdf>), as another such example.

Please see the road, rail, and waterway route maps, linked above. We provided similar route maps in July, in hard copy format, to your member offices, along with a cover letter opposing H.R. 3053, the Nuclear Waste Policy Amendments Act of 2017, sponsored by Rep. Shimkus of Illinois. In addition, letters signed by scores of organizations opposing H.R. 3053 were delivered to your office. (see, for example, <http://static1.1.sqspcdn.com/static/f/356082/27608879/1498607891980/HR+3053+Community+Opposition+Letter-1.pdf?token=reXzyO9E0c662YW%2B93SWA3jBscM%3D>, listing 50 groups opposed to H.R. 3053.)

Note that under H.R. 3053’s proposed expansion of the Yucca dump limit from 70,000 Metric Tons, to 110,000

Metric Tons, of irradiated nuclear fuel, the number of Mobile Chernobyl shipments will be increased proportionally, as well. Learn more about irradiated nuclear fuel transport risks at <http://www.beyondnuclear.org/waste-transportation/>. See my comprehensive testimony to the U.S. House Environment and the Economy subcommittee on October 1, 2015, which unfortunately fell on deaf ears, considering the content of H.R. 3053: <http://www.beyondnuclear.org/waste-transportation/2015/10/1/beyond-nuclear-testifies-before-congress-against-mobile-cher.html>.

To the contrary, the U.S. Department of Energy is now throwing caution to the wind, undertaking such unprecedented shipments as trucking highly radioactive **LIQUID** waste, for the first time in North American (and perhaps worldwide) history, from Canada to South Carolina, for no good reason in particular, exposing communities along the way to high-risk hazards. As is so often the case, NRC is complicit.

The Yucca dump is so controversial, that more than a thousand environmental groups, representing all 50 states, have advocated against the scheme over the course of years and decades (see: <https://web.archive.org/web/20151220214330/http://www.nirs.org/radwaste/yucca/yuccaopponentslist.htm>).

Similarly, nearly 500 environmental justice groups opposed previous attempts to “temporarily” store irradiated nuclear fuel in low-income, people of color communities: <https://web.archive.org/web/20080307054150/http://www.nirs.org/radwaste/scullvalley/skullvalleygoshutesgroupultr772005.pdf>.

To rebut the NIMBY (Not In My Backyard) push to “get it out of here, we don’t care where it goes,” as is so often heard at places like San Onofre, CA, I recently published a letter to the editor in the *L.A. Times*: <http://www.beyondnuclear.org/radioactive-waste-whatsnew/2017/9/14/beyond-nuclear-letter-to-the-editor-in-the-la-times.html>

Please see the “Statement for Safeguarding Nuclear Waste at Reactors,” advocating Hardened On-Site Storage (HOSS), as close to the point of generation as possible, as safely as possible. This has been endorsed by many hundreds of groups, in all 50 states. Here is the link: http://ieer.org/wp/wp-content/uploads/2010/03/HOSS_PRINCIPLES_3-23-10x.pdf. This is a reasonable interim alternative to such dangerous ideas as the Yucca dump, and parking lot dumps, and the inevitable Mobile Chernobyls they would launch.

Please consider raising these kinds of questions, touched on above, during the hearing tomorrow, on this most controversial of subject matter, highly radioactive waste, and its high-risk transport throughout the country.

If you have any questions, please contact me at kevin@beyondnuclear.org, or cell (240) 462-3216.

Sincerely,

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*P.S. Just prior to delivery of this letter, a colleague alerted me to the fact that Dr. Ed Lyman of UCS has been included on the witness panel. Given his long advocacy for nuclear safety, I am thankful for at least this much balance.