Letter/Attachment for GTCC EIS Scoping Comment #95

James L. Joyce, Document Manager
Office of Regulatory Compliance (EM–10)
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585–0119
E-mail: gtcceis@anl.gov

RE: Public comment on "Greater Than Class C" (GTCC) waste disposal plans

September 21, 2007

Dear Mr. Joyce:

Southern Alliance for Clean Energy (SACE) is a regional not-for-profit, nonpartisan conservation and energy consumer organization focused on energy policy, including nuclear concerns, for well over twenty years with members throughout the Southeast, including Tennessee and South Carolina where possible disposal measures for "Greater Than Class C" (GTCC) wastes are being proposed.

First, these types of nuclear wastes do pose serious threats to the public and environment. Yet the terminology used by the Department of Energy (DOE), "GTCC," though technically accurate, is misleading at best – the public is very unaware of the hazards associated with these nuclear waste streams. Before the DOE moves forward on this proposal, the DOE needs to do a better job explaining and defining in simple, understandable terms exactly 'what' these wastes are and what the short-term and long-term impacts will be on human health and the environment for all of the proposed actions at all of the proposed locations. Then, more effective outreach and education needs to be done in the prospective 'dump' communities so the public can truly be aware of what these proposals actually mean. We do not believe that any of the proposed actions are protective of the public or the environment; we do not believe that any of them should be pursued. Further, it is especially troubling that the options all appear to be permanent and irretrievable 'dumping' options. To imagine that one of these proposals considers actually dumping this waste in boreholes is beyond comprehension. What would be done if leaks occurred, especially if this is an irretrievable option?

As the nuclear power and weapons industry push to expand, the existing nuclear waste all over our country has yet to be properly managed. Here in the Southeast, we are already being targeted as the nation's dumping ground for nuclear waste by nuclear reprocessing schemes. And the proposed expansion of commercial nuclear power is also centered in this region. The Savannah River Site (SRS), Oak Ridge and Barnwell already have severe nuclear waste problems and these new proposals, including that of where to dump the most radioactive 'low level' nuclear wastes, are only going to make this worse. SRS currently has the 2nd largest volume of high-level liquid nuclear waste and the most amount of radioactivity at any DOE site in the nation. Our region's future is less than encouraging. Before moving forward on any of the proposed alternatives, the DOE

should study how this entire region will be burdened by all of these nuclear-waste related proposals. Such important decisions should not be made in isolation.

The DOE needs to realize that water resources are limited and debates on how this precious resource should be protected is under heated debate currently in Georgia, South Carolina and elsewhere. The Savannah River for instance may have already surpassed its assimilative capacity ability. The DOE must determine what additional water contamination would be generated by dumping very radioactive 'low level' wastes at any of the proposed sites, not just here in the Southeast, but over the short and long term. Additionally, the DOE should put this in the context of every other need that nearby water resources are required for. It is not fair to take water away from its highest and best use, which is for human consumption, in order to make profits for corporations while increasing contamination.

The issue of environmental justice needs to be thoroughly studied given the demographics of the region near SRS and Barnwell in particular. Additionally, given that the proposals would require nuclear waste to be sent from all around the country to possibly just one location, we request that environmental justice impacts be studied along all possible transportation routes and at existing nuclear reactor sites where decommission will at some point occur, including traffic through our ports such as the ports of Charleston and Savannah, among others.

In closing, we believe that none of the proposed options should be explored. The DOE needs to re-evaluate other options before moving forward in any fashion with dumping nuclear waste on unsuspecting communities not only here in the Southeast, but anywhere in our great nation.

Sincerely,

Sara Barczak, Safe Energy Director
Safe Energy Director
428 Bull Street, Suite 201
Savannah, GA 31401

Return to GTCC EIS Scoping Comments