HIGH LEVEL NUCLEAR WASTE STORAGE IN UTAH

PROPOSAL. Private Fuel Storage L.L.C. (PFS) plans to build and operate a for profit, centralized, away-from-reactor, high level nuclear waste or spent nuclear fuel storage facility for up to 40 years on the Skull Valley Band of Goshute Indian Reservation, Utah. In February 2006, the U.S. Nuclear Regulatory Commission issued PFS a license to construct and operate.

The proposed PFS facility location is in a seismically active area, under an active military operating area, and adjacent to a military bombing range — the Utah Test and Training Range. PFS is licensed to store 44,000 tons of spent nuclear fuel. Forty-four thousand tons of spent nuclear fuel is tantamount to 85% of all commercial spent nuclear fuel currently in the U.S. PFS plans to store the waste in up to 4,000 uncovered concrete storage casks on concrete storage pads.

No Need for PFS. The National Academy of Science, the U.S. Department of Energy (DOE), and NRC agree that spent nuclear fuel can be safely stored at each of the current operating and shutdown reactor sites. At-reactor storage can easily be expanded by simply building a small concrete pad for storage. There are no technical or safety reasons to move the waste and increase the risk of an accident by shipping the spent nuclear fuel across country. In fact, 90-95% of the radiological hazard is eliminated after the spent nuclear fuel is allowed to cool for 50 years. Thus, transportation risks would substantially decrease the longer spent nuclear fuel is allowed to cool at the reactor site.

No guarantee that storage will be temporary. The proposed permanent repository at Yucca Mountain, Nevada is faced with numerous technical, political, and legal problems. Yucca Mountain may never open and the PFS site could become a defacto permanent storage site

Regardless whether Yucca Mountain opens, the U.S. volume of commercial high level nuclear waste will exceed the Yucca Mountain statutory capacity in 2010. Also, barring further legal concessions, DOE will refuse spent nuclear fuel in PFS containers. Thus, prior to disposal in a repository, PFS waste must be shipped back through Utah for repackaging at the originating reactor site.

Additionally, DOE announced it will soon begin investigating the need for a second repository and identifying possible repository locations. Two former repository candidate sites in Utah will be reconsidered by DOE as new candidate sites. A PFS facility storing most of the U.S. commercial spent nuclear fuel may encourage a repository siting in Utah.

Poor Public Policy Unless Communities that Benefit from Nuclear Reactors Take Responsibility. States and communities that whose nuclear reactors have not only reaped the benefits of electricity, but substantial economic benefits from employment, taxes, and community contributions (financial and otherwise). For example, $4 out of $5 spent on education in a Wisconsin County is derived from nuclear utility taxes. Now because of the risks and stigma associated with nuclear waste, the utility companies and their communities want to keep the benefits but shift the burden of storing its spent nuclear fuel to Utah. The nuclear industry and their communities must be first to step up

and take responsibility. It is poor public policy and grossly unfair to ask Utah, a state with no commercial nuclear reactors, to bear the risks of spent nuclear fuel transportation and storage because DOE and the nuclear industry failed to adequately plan for nuclear fuel storage.

Transporting Spent Nuclear Fuel Result in Unnecessary Risks and Costs. Transporting spent nuclear fuel across country prior to the availability of a final spent nuclear fuel disposal solution creates needless risk. PFS is planning to ship more nuclear waste and at substantially further distances than has been transported in the U.S. over the entire nuclear industry history. The unprecedented shipping campaign include shipments from as far away as Maine or Florida through numerous miles of communities, including through Utah's major population and business centers along the Wasatch Front. Spent nuclear fuel from the east would enter the state via Evanston, Wyoming then be shipped through Morgan, Weber, Davis, Salt Lake and Tooele counties. Waste from California would enter near Uvanda and travel the length of the state.

Utah transportation corridor communities are not prepared for a nuclear accident. There are no monies available to assist communities with emergency response training or the purchasing of equipment.

PFS has no financial backing. PFS is a limited liability company with eight nuclear utility members. Only Dairyland Cooperative appears to be committed to building and operating PFS. The other seven PFS members have committed that it would no longer participate in PFS, they would withhold construction funds pending progress in a permanent repository, or they stopped contributing funds during the licensing phase.

Economic Impacts. Real and perceived risks of spent nuclear fuel will damage Utah's economy and businesses. The Utah Relator's Association found Utahns believe property values would decrease if the PFS facility is built. In addition, threats to military training readiness may negatively impact Hill Air Force Base which contributes $2 billion annually to Utah's economy.