

## Leshinskie, Anthony

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**From:** Ann Darling <AADEJD@hotmail.com>  
**Sent:** Wednesday, January 26, 2022 6:19 PM  
**To:** PSD - NDCAP  
**Subject:** Re: Vermont NDCAP response to DoE RFI on consent-based siting

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To members of the Federal Nuclear Waste Policy Committee and the VNDCAP Panel --

There are so many things to say about the DoE RFI on consent-based siting. I'll just stick to a few.

The most effective way to "engage" the public in "participation" is for the public, in whatever form that takes (government bodies, Tribes everyday citizens, especially those in impact communities), to be listened to and to have real authority and decision-making power. Talking about engagement isn't enough. The comments from 2017 are full of distrust of the NRC and the DoE. It is abundantly clear to me that neither the NRC nor the DoE have any skill at this, nor any true interest. I have been to many NRC hearings, and public input has been ignored; they are there to check off a compliance box, not to listen or respect. In this regard, I note that the NRC has issued a license to Interim Storage Partners in Texas despite the objections of local governmental bodies, and I fully expect they will also issue one to Holtec, despite many objections already raised in New Mexico.

The legal status of consolidated interim storage is unclear. The NWPA says no interim storage without a permanent repository. Congress appropriated money for DoE to resume its "consent-based" siting work, but is it legal to go ahead with interim storage?

In that regard, the government's money and attention would be better spent on consent-based siting of a PERMANENT repository or repositories. All this consent-based siting stuff for interim storage is a disingenuous smokescreen.

Transporting high level nuclear waste more than once is really poor planning, and it's really dangerous. Our roads, waterways, and railroads are already in trouble and shouldn't be hauling this stuff.

As I've said in previous meetings, I think the better route is to: 1) stop creating any more radioactive waste; 2) leave the HLNW where it is except where it is at risk of flooding (as at San Onofre) or other hazards, AND harden it against attack, sabotage, and the elements -- stronger casks, bermed and covered or in a building, real-time remote monitoring of radiation levels, lines of sight obscured, security personnel. -- with compensation from the federal government AND meaningful inclusion of the local community (however you define it, but more than only the host municipality) in addressing safety and environmental impact. I know this is problematic for host communities, but shipping this waste and then consolidating it all in one or two places where it isn't wanted is more problematic for the receiving communities. Who would pay for all this?!

Having been to many VNDCAP and committee meetings, it's clear to me that there are differing and opposing perspectives held by Panel members on these issues. It is hard for me to imagine that any consensus could be reached, except perhaps some narrow responses to some of the RFI questions. Personally, I think your time would be better spent on educating the community about decommissioning, waste storage, and state and

federal policy and regulation issues. That would be a good first step toward informed input from the people you are there to represent.

Thank you,  
Ann Darling