

Multi-Group Request to Extend Period for Public Comment, Intervention and Hearing Requests on EnergySolutions' Applications to IMPORT/Export Radioactive Waste From ITALY Into the USA

Office of the Secretary, secy@nrc.gov
U.S. Nuclear Regulatory Commission
Washington, DC 20555

February 28, 2008

Dear Office of the Secretary of the US Nuclear Regulatory Commission,

The Nuclear Regulatory Commission (NRC) is currently considering applications (Nos. IW023 and XW013, Federal Register Volume 73, Number 28, 2/11/08) from EnergySolutions for import/export licenses that would bring 20,000 tons, 1 million cubic feet, 600,000,000,000,000 becquerels (radioactive emissions per second) of radioactive waste (mainly from Italian nuclear power and related industries) into the US for processing including incineration, transport and disposal.

Over 50 groups and individuals listed below request a 90-day extension on the time period to request a hearing or petition for leave to intervene and for public comment.

In terms of volume, the application appears to allow close to all of the Italian "low and intermediate" level nuclear waste inventory to be brought to the US through US ports, on US roads, rails and/or waterways for processing in Tennessee and dumping either in Tennessee or at the licensed nuclear dump in Utah.

The activities of the nuclear waste processors in Tennessee, including EnergySolutions, which release some nuclear waste into regular solid waste trash dumps and into recycling streams, currently are being questioned and challenged in that state.

Importing such massive amounts of nuclear waste for transport and processing could affect the ability to manage our own country's growing amounts nuclear waste.

The NRC itself took well over a month from receipt the applications to review and open them to public comment and intervention; the public should be afforded significant additional time needed to fully understand and provide input.

Because of the

→unprecedented large amounts of waste and radioactivity involved

→potential impact on ports, transport routes, communities with processors and those downwind and downstream

→questions about security, safety and the costs of both at ports and in transit

→increased potential for radioactive materials deregulated via EnergySolutions to get into commerce or unregulated waste facilities

→newness of the information to many potentially affected parties and communities

→potentially disproportionate impact on communities of color and low income communities in several of the directly affected states

→national precedent for importing radioactive waste from other countries

we call for a ninety-day extension on the comment, hearing and intervention request period for the EnergySolutions import/export licenses for Italian nuclear waste.

Sincerely,

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