

What's Wrong with Centralized Interim Storage (CIS)

1.) *Unnecessary expense for no urgent problem*

- No added safety benefits that would not also be present at a facility with “hardened on-site storage” (HOSS) are present at proposed CIS facilities.
- NRC (and industry) says High Level Radioactive Waste (HLRW) is “safe” at reactor sites: 2014 NRC report on its “waste confidence” rule states, “spent fuel generated in any reactor can be stored safely and without significant environmental impacts for at least 60 years beyond the licensed life for operation of that reactor,” either in the spent fuel pools or in “dry casks.” There is no urgent compelling environmental need.
- Estimated CIS costs for expected reactor closures is between \$1.5 and \$3.7 billion

2.) *Contaminates more sites requiring costly environmental cleanup later*

3.) *Widespread Opposition, Environmental Justice issues*

- Opposed by largely Hispanic and Native American affected communities in TX and NM
- Opposed by a 2014 Conference Resolution of the U.S. Council of Mayors: “2014 ADOPTED RESOLUTIONS: Require that the U.S. Department of Energy focus on the safe treatment and storage of radioactive waste **on-site** where appropriate to mitigate health and environmental risks of transporting low, high and mixed level waste to offsite treatment facilities.”
- Opposed by 50 state and national environmental organizations in a June 24, 2017 letter to Rep. John Shimkus, sponsor of H.R. 3053. No safety, environmental or public acceptance criteria have been put in this legislation.

4.) *Triggers unnecessary and increasingly risky transportation of HLRW on crumbling road/rail/waterway infrastructure*

- A March 9, 2017 American Society of Civil Engineers report gives Illinois “D” and “D-“ ratings for its roads and rail lines respectively - both higher than the national average.
- Waste will have to be moved/transported a *second time* when disposal site is found.

5.) *DOE finds Illinois to be “optimal” site for a first CIS site:* “As a totally separate analysis, the consolidated ISFSI site **in Illinois is the single optimized site** for an ISFSI solution when only SNF at orphaned reactors is considered relative to siting a consolidated ISFSI.”

--Oak Ridge National Lab, June 2012 ORNL/TM-2012/237--

6.) *May become de-facto permanent, and inhibit efforts to establish a permanent disposal site*

- Currently the Nuclear Waste Policy Act of 1982 and its amendments requires that a permanent repository, to store High-Level Radioactive Waste, must be licensed before a Centralized Interim Storage Facility is constructed.
- Creation of CIS facilities becomes a disincentive to establish as permanent deep-geological disposal facility; “interim” will become de facto “permanent” through inaction.

7.) *May be clandestine cover to establish “reprocessing” of HLRW*

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