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cc:
Subject: EIS Comment

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The Commentors Name:

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---> position : Radioactive Waste Watchdog

Comment Text :

--> Dear DOE EIS Office,

Given the re-affirmation in the current round of SEISs that barge shipments of high-level radioactive wastes would take place on the Great Lakes under the Yucca Mountain repository transport plan, please find below a resolution against such high-level radioactive waste barge shipments on the Great Lakes passed by Great Lakes United in 2004.

Great Lakes United is a U.S.-Canadian coalition comprised of scores of organizations dedicated to protecting the Great Lakes environment. Please find a listing of member groups at the bottom.

Sincerely,

Kevin Kamps
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(and member of the Great Lakes United Nuclear-Free Green Energy Task Force, and board member of Don't Waste Michigan, a Great Lakes United affiliated group)

1 [Prohibition of Barge Shipments of High-Level Radioactive Waste on the Great Lakes

Whereas, in its February 2002 Final Environmental Impact Statement for the proposed national high-level radioactive waste (HLRW) dump-site at Yucca Mountain, Nevada, the U.S. Department of Energy (DOE) proposed up to 453 barge shipments (Appendix J: Transportation, Table J-27) of highly radioactive irradiated nuclear fuel waste upon the waters of Lake Michigan from commercial nuclear reactors in Wisconsin and Michigan to the ports of Milwaukee and Muskegon and

Whereas DOE reaffirmed its proposal to barge highly radioactive wastes on U.S. waterways in its Federal Register announcement and Record of Decision in April 2004 to use mostly rail shipments to Yucca Mountain via the Caliente, Nevada rail corridor and

Whereas DOE's decision to use "mostly rail" shipments means that nuclear reactors lacking direct rail access, such as Point Beach, Kewaunee, and Palisades on the Lake Michigan shoreline, are now more likely to use barges to ship irradiated nuclear fuel to the nearest rail head and

Whereas the U.S. Nuclear Regulatory Commission's (NRC) design criteria for HLRW transportation casks only account for accidental underwater submersions to a depth of 200 meters (656 feet), while Lake Michigan is more than 200 meters deep in locations near DOE's proposed barge routes (DOE FEIS, Figure J-9) and

Whereas NRC does not require full-scale physical safety testing of HLRW shipping containers and

Whereas each barge would carry a rail-sized HLRW shipping container, which would hold up to 240 times the long-lasting radioactivity (in terms of radioactive cesium isotopes alone) released by the Hiroshima atomic bomb and

Whereas HLRW rail casks on barges fully loaded with irradiated nuclear fuel would weigh 100 to 150 tons, requiring special heavy-load cranes that could greatly complicate or delay emergency cask recovery operations and

Whereas underwater submersion accidents could cause release of radioactive contaminants, or the inadvertent nuclear chain reaction of fissile materials still present within the HLRW due to the neutron-moderating effect of infiltrating water and

Whereas Lake Michigan, which flows into the rest of the Great Lakes and St Lawrence Seaway, is the source of drinking water, recreation, tourism, industry, and fisheries for many tens of millions of people, in the United States, Canada, and indigenous First Nations,

Therefore be it resolved that Great Lakes United urges the prohibition of shipments of high-level radioactive waste on the Great Lakes.]

I HEREBY CERTIFY THAT THIS IS A TRUE COPY OF A RESOLUTION ADOPTED BY GREAT LAKES UNITED AT THE JUNE 6, 2004 ANNUAL GENERAL MEETING IN NORTH EAST, PENNSYLVANIA.

Loretta Michaud, Secretary
Date

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Great Lakes United Coalition Organizational Members
Organization State/Province City
3520129 CANADA, INC. PQ Longueuil
Absolute Marketing NY Buffalo
Algonquin Eco Watch ON Spring Bay
American Association of University Women - GL Region WI Janesville
American Federation of Gov't Employees - Local 3908 MI Ann Arbor
Asbury Woods Nature Center PA Erie
Audubon New York NY Ithaca
Bay Area Restoration Council ON Hamilton
Bay Niche Conservancy ON Montreal River Harbour
Benedictine Sisters of Erie PA Erie
Bowling Green State University - Jerome Library-Serials Department OH
Bowling Green
Brampton, Mississauga & District Labour Council ON Brampton
Brown County Conservation Alliance WI Green Bay
Bruce Peninsula Environment Group ON Lion's Head
Buffalo & Erie County Public Library - Science & Tech Department NY Buffalo
Buffalo Environmental Management Commission NY Buffalo
Buffalo Fire Department Federal Credit Union NY Buffalo
Canadian Institute for Environmental Law and Policy ON Toronto
Canadian Union of Public Employees - Local 786, St. Joseph's Hospital ON
Hamilton
Canadian Union of Public Employees - Local 5167 ON Hamilton
Catholic Teachers Association ON Toronto
CAW Durham Regional Environment Council ON Oshawa
CAW - Local 1044 PQ Quebec
CAW - Local 1075 ON Thunder Bay
CAW - Local 1520 ON St. Thomas
CAW - Local 1524 ON Kitchener
CAW - Local 1837 ON Kingston
CAW - Local 199 ON St Catharines
CAW - Local 200, Retired Workers Chapter ON Windsor
CAW - Local 2169 MB Winnipeg
CAW - Local 222 ON Oshawa
CAW - Local 252 ON Mississauga
CAW - Local 27 ON London
CAW - Local 4268 ON Waterford
CAW - Local 4451 ON Stratford
CAW - Local 4515 ON Kitchner
CAW - Local 456 ON Sarnia
CAW - Local 584 ON Brampton

CAW - Local 676 ON St. Catharines
CAW London Regional Environmental Council ON St. Thomas
CAW-TCA Locale 510 PQ Longueuil
CAW-TCA Locale 672 PQ Larnet
Centre d'ecologie urbaine PQ Montreal
Centre écolgique de la Mer-Douce ON Penetanguishene
CEPU Locale 672 ON Sarnia
Communications, Energy, & Paperworkers Union - Local 672 ON Sarnia
Ciminelli Development Company NY Buffalo
Citizens Concerned for Michipicoten Bay ON Wawa
Citizens Environmental Research Institute NY Farmingdale
Citizens for Alternatives to Chemical Contamination MI Bay City
Citizens For Renewable Energy ON Lion's Head
Coalition for a Nuclear Free Great Lakes MI Monroe
Comite ZIP de la rive nord de l'estuaire PQ Baie Comeau
Comite ZIP des Seigeuries PQ Joliette
Comite ZIP Jacques Cartier PQ Montreal
Communications, Energy, & Paperworkers Union - Local 672 ON Sarnia
Communications, Energy, Paperworkers Union of Canada ON Ottawa
Conserver Society of Hamilton & District ON Dundas
Council of Canadians ON London
Cuyahoga River Remedial Action Plan OH Cleveland
Delta College Library MI University Center
Delta Institute IL Chicago
Eastern Surfing Association (Great Lakes District) NY Buffalo
EcoCity Cleveland OH Cleveland
Ecology & Environment, Inc. NY Lancaster
Ecology Center MI Ann Arbor
Energy Probe Research Foundation ON Toronto
Environmental Association for Great Lakes Education MN Duluth
Environmental Coalition on Nuclear Power PA State College
Environmental Commissioner of Ontario ON Toronto
Environmental Law & Policy Center IL Chicago
Friend NPCA OH Gates Mills
Friends of Red Hill Valley ON Hamilton
Friends of the Bayfield River ON Clinton
Friends of the Buffalo Niagara Rivers NY Buffalo
George Washington Fishing & Camping Club NY Buffalo
Georgian Bay Association ON Toronto
Grand Traverse Regional Land Conservancy MI Traverse City
Grand Valley State University Library MI Allendale
Grand Valley State University Annis Water Resources Institute MI Muskegon
Great Lakes Fishery Commission MI Ann Arbor
Great Lakes FX NY Fredonia
Great Lakes Research Consortium NY Syracuse
Hamilton & District Labour Council ON Hamilton
Heartwood IL Brookport
UAW IMGI Community Action Program Council MI Edmore
Indian Creek Nature Center NY Gouverneur
Interface Flooring Systems ON Belleville
International Brotherhood of Electrical Workers - Local 636 ON Mississauga
Jan's Professional Dry Cleaners MI Clio
John G Shedd Aquarium IL Chicago
Jr. Pennsylvania Lake Erie Watershed Association PA Erie
Key Publishers ON Toronto
Lake Erie Region Conservancy PA Erie
Lake Erie-Allegheny Earth Force PA Erie
Lake Huron Watershed Clean-up Team ON Grand Bend
Lake Michigan Federation IL Chicago
Lake Superior Greens WI Superior
Lakehead University, Paterson Library - ACQ Serials Section ON Thunder Bay

L'Association des Riverains PQ Lambton
League of Women Voters - Lake Erie Basin Committee OH Euclid
League of Women Voters - Toledo Lucas County OH Sylvania
Library of Michigan -- Serials section MI Lansing
Little River Enhancement Group ON Tecumseh
London & District Labour Council - Environment Committee ON London
Long Point Basin Land Trust ON Port Rowan
Long Point Region Conservation Authority ON Simcoe
Marine Trades Association of WNY, Inc. NY Buffalo
Mecanique Industrielle B Courteau Inc. PQ Varennes
Toronto and Region Conservation Authority ON Downsview
Michigan Environmental Council MI Lansing
Minnesota Environmental Partnership MN St. Paul
Mohawks of the Bay of Quinte - Tyendinaga Mohawk Territory ON Deseronto
National Audubon Society of New York NY Albany
National Wildlife Federation MI Ann Arbor
NET Force Ont Welland
Niagara County Health Department NY Lockport
Niagara River Restoration Council ON Saint Catherines
Northwatch ON North Bay
Northwoods Wilderness Recovery MI Marquette
Oakvillegreen Conservation Association Inc ON Oakville
Ohio Environmental Council OH Columbus
Ontario English Catholic Teachers Association ON Toronto
Ontario Federation of Labour ON Don Mills
Ontario Ministry of Natural Resources ON Owen Sound
Ontario Toxic Waste Research Coalition ON Kitchener
Parks Canada - Information Resource Centre ON Cornwall
Penfield Library SUNY at Oswego - Serials Department NY Oswego
Pennsylvania Lake Erie Watershed Association PA Erie
Public Interest Research Group MI Ann Arbor
Planetary Productions, Ltd. WI Neshkoro
Pollution Probe ON Ottawa
Port Hope Community Health Concerns Committee ON Port Hope
Quinte Watershed Cleanup Inc. ON Belleville
Rene Larson Law Office ON Thunder Bay
Rollins Investment Inc. ON Belleville
Sarnia & District Labour Council ON Sarnia
Save Lake Superior Association MN Beaver Bay
Save the Oak Ridges Moraine Coalition ON Aurora
Save the River NY Clayton
Sierra Club - Northeast Regional Conservation Committee PA Pittsburgh
Sierra Club - Midwest WI Madison
Sierra Club - Midwest, Regional Conservation Committee WI LaCrosse
Sisters of St. Joseph PA Erie
SONS of Lake Erie PA Erie
Sporleder Architects IN Notre Dame
STOP PQ Montreal
The Brico Fund, Inc. WI Milwaukee
Thousand Island Land Trust NY Clayton
Tip of the Mitt Watershed Council MI Petoskey
Toronto & Region Remedial Action Plan ON Toronto
Tri-Main Development LP NY Buffalo
Trout Unlimited - Illinois Council IL Oak Brook
Trout Unlimited - Oak Brook Chapter IL Oak Brook
Trout Unlimited, Inc. VA Arlington
UAW - Local 137 MI Greenville
UAW - Local 2031 MI Adrian
UAW - Local 55 NY Williamsville
UAW - Local 897 NY Buffalo
UAW - Local 599 MI Flint

UAW - Local 599 MI Flint
UAW - Local 730, Conservation Committee MI Wyoming
UAW - Racine/Kenosha Community Action Program Council WI Racine
FUnited Food & Commercial Workers Locale 1000A ON Woodbridge
Union quebecoise pour la Conservation de la nature PQ Chicoutimi
United Steelworkers of America NY Albion
University at Buffalo - Library Serials Department NY Buffalo
University of Michigan Science Library MI Ann Arbor
University of Waterloo, Environment and Resource Studies ON Waterloo
University of Toledo William S. Calson Library OH Toledo
Upper Peninsula Environmental Coalition MI Houghton
Waterloo Regional Labour Council ON Kitchener
West Michigan Environmental Action Council MI Grand Rapids
West Seneca Rotary NY Orchard Park
Windsor & District Labour Council ON Windsor
Wisconsin Historical Society WI Madison
Woodhouse Library Aquinas College MI Grand Rapids
Workers Health and Safety Centre ON Don Mills
