

# Between the Lines

Nuremberg Actions, PO Box 13 Boulder Creek CA 95006

May 1995 #47

## CONCORD SAYS NO TO NUCLEAR WASTE

Jennifer Viereck

On the evening of Monday, May 22, a heated crowd gathered at the Concord Centre, to be heard at the Department of Energy's (DOE) public hearing. The topic was the DOE plan, publicized only one month ago, to bring spent nuclear fuel from foreign reactors into the US for storage through the Concord Naval Weapons Station (CNWS). About 250 people packed the room, far above the average of 20 per hearing that the DOE has experienced in other locales. CNWS is one of 10 ports under consideration, and only recently added to a list first publicized on October 21, 1993. Any or all of them could be designated in the Final Environmental Impact Statement due out in September, 1995. With no period for public comment, a final decision would be publicized one month later.

Approximately 12 shipments a year are planned for the west coast, for a period of thirteen years. The DOE is in quite a hurry, so as not to cause one day's delay at the overseas reactors in question. They hope to begin shipments in early 1996. Closure for public comment is June 20, 1995. Any additional comments should be mailed to the address at the end of this article.

The DOE had clearly prepared for a smaller group, with cookies, coffee and soft drinks, as well as glib and glossy literature which included such plabum as:

*"Whether or not you know it, you are very familiar with radiation.... When you use a television, radio or microwave oven, you are harnessing low-energy non-ionizing radiation.... Radiation comes from practically everywhere because atoms are nature's most basic building blocks. The earth; our water, food and air; and our own bodies are all sources of radiation."*

The size and fury of the crowd clearly startled the DOE, and the independent facilitator (who had conducted the previous meetings as well). The list of speakers (many of them well-known Bay Area anti-nuclear experts) who had followed stated procedure and registered to speak in advance was "lost" temporarily, the floor was opened to general discussion, and speaking time cut down from five minutes to two or three. An attempt by the assembled citizens to return to the stated format was largely successful, although public officials from Concord, Martinez and Contra Costa County, as well as irate representatives from recently formed neighborhood groups initially took the floor for some time.

Mr. Charles Head, DOE's Development Director for this Environmental Impact Statement, attempted to respond to the largely irate and often very well-informed comments by the public.

### BACKGROUND (FROM LAST ISSUE)

Starting with the "Atoms for Peace" program in the 1950's, the US provided several tons of Enriched Uranium as nuclear fuel for foreign research reactors in about 28 countries. This was part of a deal to assist countries in "peaceful applications" of nuclear technologies (i.e. development of civilian nuclear power) if they agreed to forgo development of nuclear weapons. These countries agreed to return the spent fuel to the US. Plutonium from spent fuel rods can also be used to make nuclear weapons.

In 1958, the US began accepting spent reactor fuel. In the beginning, it reprocessed much of the fuel for weapons (the very thing it sought to prevent all other nations from doing), and has since placed rods in storage.

No US origin spent rods have been transported to the US since 1988. Now, spent nuclear fuel storage at certain foreign research reactor sites is fast reaching capacity. The DOE is proposing to resume acceptance of US origin foreign spent fuel at one or more marine ports, including CNWS so that those sites would be free to continue to operate, and therefore generate more nuclear waste. DOE would take title to up to 15,000 fuel elements over the next 15 years.

### Primary among citizen concerns were:

- Additional time to consider the six inch documents outlining the DOE plan which most participants had only received one or two weeks ago, and to conduct independent research and community discussions;
- Advance notice of all local routes out of CNWS intended for transportation of nuclear materials;
- Whether closing the Port Chicago Highway through the CNWS in February, new crane installations and dredging currently going on signified a predisposition to using the CNWS port regardless of public opinion;
- Why only the city planner of Concord was informed of the plan and not other poorer and minority neighborhoods closer to the CNWS;
- Whether the use of a military port was to preclude citizen's groups from doing independent radiation monitoring and testing;
- How citizens were to be expected to trust a governmental body that had been operating freely in total secrecy, bombing its Native Nations and experimenting on its own veterans for forty five years;
- Whether separation of classes of fuel rods for different destinations as stated by Mr. Head indicated plans by the DOE to restart former programs to reprocess spent fuel into weapons-grade material;
- Why DOE statistics on health hazards differed so greatly from

information independently available;

- Why no concern about earthquake hazards in the Bay Area were included in the DOE assessment;
- Why the Bay Area was being assessed, when it is one of the most highly populated areas in the US, has numerous bridges and seven oil refineries in the Carquinas Straits alone, with 240 shiploads of petroleum products a year in the Bay;
- The contradiction between the DOE wanting to remove the waste material from such stable and solvent countries as Sweden and Belgium to keep it safe from revolutionaries and terrorists, and scoffing at any concerns over safety from seizure to US communities along the routes;
- Who would monitor the quality of handling of said materials (one local resident stated that CNWS had "the worst trained and worst paid drivers handling equipment at the piers" anywhere);
- Why the DOE was apparently ignoring federal law on siting such operations in a way that jeopardized the safety of minority and low-income neighborhoods (not even included in DOE maps or comments) more than others;
- Whether any federal assistance would be given to improve very degraded roads and railway beds under question; and
- Whether any special training or funding would be given to local emergency response teams to handle such accidents.



Figure 3-2 Countries which Host the Research Reactors

Generally, the crowd seemed to find Mr. Head's responses inadequate. For example, his statement that "the only thing local officials would need in the case of a highway accident was a roll of yellow tape to cordon off the area before the federal experts arrived" was greeted with audible derision.

Jennifer Viereck of Nuremberg Actions read aloud from two published reports on accidents and safety concerns at the CNWS, citing over 100 munitions handling accidents between 1987 and 1992, involving everything from train collisions to dropping bombs and missiles onto ships, piers and into the Sacramento River. ("Catastrophe & Coverup: Accidents at the CNWS", Between the Lines, November 1993)

Viereck also read from an interview by Maylie Scott with a former base employee who stated that employees were poorly trained in crane operating hand-signals, equipment use, and materials were mismarked. ("Who Protects the CNWS?", Between the Lines, May/June 1994) There was no substance abuse testing, and equipment operators were often noticeably intoxicated. Ships arrived in port so poorly loaded that they listed, and bombs dropped in the water were often left there, so as not to slow down operations or endanger foremen's job-records. Cover-up, this employee said, was "the order of the day".

Mike Veiluva, of the Western States Legal Foundation, stated that health hazard figures in the DOE PEIS were highly misleading, and spelled out how they were obtained. He told the crowd that one independent consultant found that "the potential for a plume of

radioactivity resulting from a serious high-intensity long-burning ship fire could result in the contamination of over 100 square kilometers. This is the other side of the story." Veiluva ended his presentation by giving Mr. Head a six pack of diet soda, and a jar of peanut butter, as a "local custom". DOE materials had stated that exposure to proposed waste shipments was no more dangerous than drinking 30 cans of diet soda or eating 40 tablespoons of peanut butter in any one year.

Marylia Kelley of Tri-Valley Citizens Against A Radioactive Environment pointed out that in her years of investigation into the Lawrence Livermore Laboratory, she had seen the peanut butter graph before, and in one instance proved that the DOE's risk assessment for Livermore was off by a factor of seven.

One speaker, Colin Bailey, who supported the use of nuclear power, said that he could simply not trust the DOE. He stated that he believed that "the containers are probably so safe that you could drop one off the Empire State Building and nothing would happen, but if it did, I don't think that you guys would tell us. If you dropped one in the Bay, I think it would just disappear."

The feelings of the crowd seemed to be summed up most succinctly by Frank Running Horse, "[The people at] CNWS are the same people who blew Port Chicago off the map in 1944. These are the same people who ran a train over Brian Willson when he was just sitting there.... This stuff is dangerous for 240,000 years. Human civilization has been around for 8,000 years. Nothing has been invented that hasn't broke down yet."

**ACTION:** Send your comments before June 20th to:  
Mr. Charles Head  
Office of Spent Nuclear Fuel Management (EM-7)  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington DC 20585 #

## WARD VALLEY ALERT

A long-awaited report by a biased panel of scientists with the National Academy of Scientists (NAS) has approved the construction of a nuclear waste dump at Ward Valley, CA. Although the report recommends additional tests to determine if radioactive wastes buried in shallow trenches would reach the ground water and the Colorado River, Secretary Babbitt appears ready to transfer the land to California Governor Pete Wilson who will build the dump before the tests are done. In other words, dump now, test later.

Ward Valley is located 22 miles west of Needles, CA in the beautiful east Mojave desert. Plans are to bury long-lasting and highly dangerous radioactive wastes from nuclear plants in shallow, unlined trenches. Ward Valley is located adjacent to the new Mojave National Preserve and is surrounded by eight Wilderness Areas. The Fort Mojave, Chemehuevi and Colorado River Indian Tribes adamantly oppose the dump project and consider Ward Valley traditional homeland.

The proposed nuclear dump is right above a major aquifer and 18 miles from the Colorado River. Scientists with the USS Geological Survey halted the project with a report warning that leaking radionuclides could contaminate the Colorado River. Secretary Babbitt ordered the NAS report but the majority of scientists selected for the panel have serious conflicts of interest. Two of the panel members dissented, calling for additional tests before the dump is built.

In 1994, Ward Valley was designated critical habitat for the federally-listed desert tortoise, an ancient species which has lost half its population in the last seven years. This part of the pristine Mojave

desert is considered by biologists to be the very best desert tortoise habitat essential to the survival of the species. Amazingly, the NAS report recognized the importance of the habitat but recommended sacrificing the tortoises to make way for the dump.

#### **COSTLY SUBSIDY FOR NUCLEAR POWER INDUSTRY**

An alert from the Ward Valley Coalition states: The push for the Ward Valley dump comes from the powerful nuclear energy lobby looking for a way to transfer liability for nuclear wastes to the taxpayer. Once nuclear wastes are shipped from reactor sites to Ward Valley, they become the public's responsibility. Ward Valley could become a national nuclear waste dump, accepting waste from the country's aging commercial reactors. The dump contractor, US Ecology, has left a trail of leaking dumps and litigation across the nation.

**ACTION:** Ask Secretary Babbitt to wait to transfer the land until all tests recommended by the NAS are conducted by independent inquiry.

Secretary of the Interior Bruce Babbitt  
1849 C Street, NW, Room 6151  
Washington DC 20240  
202-208-6416, Fax 202-208-5133

Source: *San Jose Mercury News*, June 1, 1995; Ward Valley Coalition Emergency Alert (reach them at 415-752-8678 or 800-454-3016). ♣

#### **NPT TREATY EXTENDED**

The Nuclear Non-Proliferation Treaty (NPT) was extended indefinitely on May 11 by a full session of the review conference in New York without a vote. A final decision had to be reached by the following day. The Treaty, signed by 178 nations, went into effect in 1970. The conference also agreed on measures to strengthen the treaty, and called on all states in the Middle East to join, an indirect reference to Israel's nuclear arsenal.

Israel, India and Pakistan have all refused to sign the pact and are all widely suspected of having the bomb. Israel stated that it had no intention of joining as long as it felt that Iran and other countries threaten its existence.

The NPT allows only five declared nuclear powers-- the United States, Russia, China, France and Great Britain. Nations without nuclear arms renounce them for good, while weapons states promise to disarm and develop "peaceful nuclear cooperation" in other areas under international safeguards.

Many developing nations have accused the nuclear powers of failing to disarm fast enough. They have pressed for more frequent reviews of the pact, a formal halt to nuclear testing, better security assurances and an end to the production of fissile materials.

The United States and its allies, arguing that missile arsenals have already been slashed since the end of the East-West conflict, were reluctant to make concessions, but agreed to do so to win overwhelming backing for extending the treaty. They have reaffirmed the treaty's ultimate goal of a nuclear-free world, although there is no fixed timetable so this is likely to remain a distant dream.

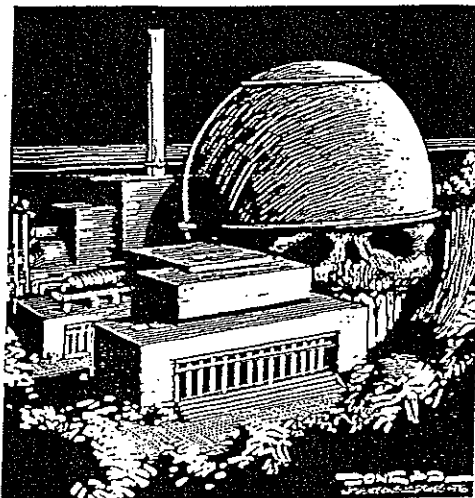
The five declared nuclear powers, which still have well over 20,000 operational warheads between them, also agreed to complete a Comprehensive Test Ban Treaty (CTBT) next year and to start talks on ending the production of material used to make bombs. CTBT negotiations are to resume on May 29, 1995.

Four days later, China conducted a nuclear test at its Lop Nor test site. Some reports indicate that two more tests can be expected in 1995

and three in 1996. China last tested in October, 1994.

Conservative Jacques Chirac, who was elected as the new French President on May 7, is expected to abandon a three-year-old testing moratorium with a new round of nuclear blasts at the Pacific Island Moruroa Atoll. On March 16, Chirac told Reuters News Service, "Does France need to carry out a few more tests if it is to do without them in the future without harming the reliability and credibility of its weapons? Many experts believe so...if that is the case, a decision will have to be taken rapidly, while announcing clearly the date at which France will put a final end to its experiments." The tests are expected by experts to take place as soon as June, when the climate, both political and atmospheric, will be most advantageous.

Source: *CTB Clearinghouse: independent and Reuters reports*. ♣



#### **US NUKE WASTE HEADS NORTH**

Don Kossick's article for *Briarpatch* magazine, "Nuclear Waste Dump Target" (Feb. 1995), exposes the Atomic Energy of Canada, Ltd.'s (AECL) plan to turn Northern Saskatchewan into an international nuclear waste dump site, with the Meadow Lake Indian Band receiving shipments from temporary dump sites to be located on other Native reserves in the US. Kossick writes, "One article in the Canada-US Free Trade agreement specifically says that Canada cannot reject nuclear waste from coming into the country."

Kossick cites documents showing "links between the Meadow Lake Tribal Council in Saskatchewan with the Mescalero Apache Tribal Council in New Mexico for 'a fully privatized spent fuel disposal system opportunity'. The plan is for individual nuclear utilities to contract with the Mescalero Apaches for storage of spent fuel at a temporary storage facility. The Mescaleros will in turn contract with the Meadow Lake Tribal Council for permanent storage. This plan was prepared for the Mescalero Tribal Council by nuclear waste consultant Miller Hudson...for a meeting which took place in 1994."

Source: "*Candu Diplomacy & NAFTA'S Nuclear Agenda*" by Joyce Nelson, *Z Magazine*, June 1995. ♣

#### **WOODPECKERS GROUND SPACE SHUTTLE**

A pair of mating flicker woodpeckers have done what many activists have tried hard to do: ground the space shuttle at Cape Canaveral. In pursuit of making their home in the largest tree around, they have drilled six dozen holes in the 15 story fuel tank, delaying the June 8 flight up to two months. Source: *San Jose Mercury*, 6/1/95

## TRACK RECORD

As Nuremberg Actions approaches its eighth birthday, a number of new things are happening, some more pleasing than others. As I reviewed weapons and arrest logs for 1995 last night, I noted that we are only seven arrests away from 2,000 since June of 1987. It's enough to give a person ideas...

We will be gathering at the tracks on Saturday, June 10, at noon for our eighth anniversary. Jackie Cabasso of Western States Legal Foundation will be the featured speaker, giving the latest details on the proposed plan to route nuclear waste shipments through the Concord Naval Weapons Station, as well as nine other proposed ports. (See cover story) Please bring food and drink to share, protection from the sun, and perhaps something to sit on, as well as lots of friends and creative ideas. We only have until June 20th to respond to this plan.

### Other things to do:

- Collect signatures on the enclosed petition;
- Collect soda cans to mail to the DOE with the enclosed label;
- Call Congressman George Miller at 510-602-1880 or 202-225-2095 and urge him to take a stand;
- Write a letter to the Contra Costa Times editor at PO Box 5088, Walnut Creek CA 94596.
- Join the newly formed coalition of civic leaders and others responding to the issue. Next meeting, 6/13 7:00 pm in Pleasant Hill. Call Western States for details at 510-839-5877. This group has met once, drafted the enclosed petition, and sent letters out to 35 city governments in three surrounding counties asking them to respond to the DOE's plan.

**Related urgent news:** On June 29, a very important meeting will take place in Livermore: the Scoping Meeting for the PEIS on "Stockpile Stewardship and Stockpile Management". In real terms, it's about modernization of the nuclear weapons arsenal: maintaining design and production capability for the labs.

Says Jackie Cabasso, "It's very important for people to turn out to say what they think the future of nuclear weapons should be. This is the closest we have ever come to a public form on nuclear weapons policy."

Two sessions will be held, at 11:00 am and 6:00 pm, at the Villa Tassajara, 6363 Tassajara Rd., in Pleasanton. No number has been published yet to sign up; Call Western States or Tri-Valley CARES for more info.

The ongoing "Nuremberg Actions Book Project" has been revived: Hal Carlstad has privately hired writer and journalist Linda Mannheim to oversee and edit a compilation of existing materials. She has prepared a draft outline and summary of publishing options, and sent it out to a number of people for comment. If you did not receive a copy and wish to, please call or write the office.

**KEEP OUR BAY, ROADS & RAILS  
SAFE FROM UNNECESSARY  
NUCLEAR ACCIDENTS!**

**NO NUCLEAR WASTE AT THE CNWS!**

**JUNE 10, 12:00 NOON AT THE TRACKS**

**FEATURED SPEAKER: JACKIE CABASSO**

## CALENDAR

- June 10, noon-- Eighth Anniversary of Nuremberg Actions, gather at the tracks. Featured speaker: Jackie Cabasso of Western States, on DOE plan to route nuclear waste through CNWS..
- June 15-26- Food Not Bombs International Gathering, at and near UN Plaza on the 50th anniversary of the founding of the United Nations. 1-800-884-1136.
- June 26, 7:00 pm 20th Anniversary of FBI Assault on Jumping Bull ranch in S. Dakota, for which Leonard Peltier serves two life sentences. Loudon Nelson, Room 3, Santa Cruz.
- June 29, 11 am and 6 pm- DOE Scoping Mtg. on Stockpiling Nukes, Villa Tassajara, 6363 Tassajara Rd., in Pleasanton. No number has been published yet to sign up; Call Western States at 510-839-5877 for Tri-Valley CARES for more info.
- Aug. 4-9- August Desert Witness at the University of Las Vegas & the Nevada Test Site. Join Fr. Miguel D'Escoto, Terry Tempest Williams, Arun Ghandi, Dolores Huerta and others for the 50th anniversary of the bombing of Japan by the United States. Register by June 15 for best rates. Call Jody at NDE at 510-261-1005 for more information.
- Aug. 6: 10:00 am- NUCLEAR FREE WORLD OR NUCLEAR FREE-FOR-ALL? Rally and Direct Action at Lawrence Livermore Labs. Caravan to University of CA at Berkeley for "Hands Around the University", 3-5 pm. Call August 6 Coalition to Abolish Nuclear Weapons for more info: 510-832-4347.

### Nuremberg Actions Wish List:

Filemaker database program for Windows

Ink Jet printer (we have no working printer since the first of the year);

PCMCIA fax/modem card, Type I, II or III

**Nuremberg Actions was founded in 1987, by citizens concerned with their responsibilities to stop US war crimes and uphold international law as defined by the Nuremberg Principles. Between the Lines is published 10 times a year and mailed to donors. Additional donations make further distribution possible for educational purposes.**

**Editor and publisher: Jennifer Viereck**

**Submissions accepted to the 23rd of each month.**

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## RETURN OF SPENT FOREIGN NUCLEAR FUEL THROUGH CONCORD NAVAL WEAPONS STATION

**What Is Being Proposed:** The U.S. Department of Energy (DOE) has released a draft Environmental Impact Statement (EIS) in connection with its proposal to return spent U.S.-produced nuclear fuel for foreign nuclear power plants, to the United States for storage and disposal. The spent nuclear fuel consists of used fuel rods containing enriched uranium and radioactive byproducts. The draft EIS released in April lists the Concord Naval Weapons Station (Concord NWS) as one of ten proposed U.S. entry ports, of which three are on the West Coast. From the entry ports, the spent fuel rods will be shipped to temporary storage facilities such as Hanford or the Nevada Test Site. The spent fuel will remain there until a permanent site for "disposal" is chosen in the future.

The draft EIS (available by calling 1-800-7EM-DATA) is the second stage in the legal process required under the National Environmental Policy Act (NEPA) for major federal actions affecting the environment. DOE has opened a sixty day window for the public and local governments to submit written comments, which will close on June 21. An earlier "scoping" hearing (before preparation of any draft document) was held in Oakland in November 1993. At that time, Oakland was proposed as the likely California entry port for spent fuel; this plan was vigorously opposed by city officials, as well as by Western States Legal Foundation and Greenpeace U.S.A.

**Submission of Written Comments:** A Public Hearing was held in Concord on May 22. Written comments are due by June 20, 1995. Written comments should be sent to: Public Comments on the Draft FRR SNF EIS, Attention: Charles R. Head, Office of Spent Fuel Management (EM-37), United States Department of Energy, 1000 Independence Ave., SW, Washington, DC 20585-0001. Comments received after the close of the comment period will be considered to the extent practicable.

The public comment period and hearing is perhaps the most important process under NEPA, since it is the opportunity for concerned citizens to have a voice in important federal decisions. In particular, DOE is required by law to solicit and consider comments regarding the scope of the project, proposed alternatives, and likely health and safety impacts, among other issues.

After the public comment period closes, DOE will prepare and release the final EIS to respond to public and government agency comments (projected for September 1995), render its final decision, and proceed to implement its proposed policy.

### **What Is Spent Nuclear Fuel and Is It Dangerous?**

Most nuclear power plants use either low-enriched uranium (LEU) or highly-enriched uranium (HEU) as fuel to generate energy through fission. The fuel "burns" (undergoes fission) and eventually breaks down into a mix of fissionable uranium along with highly radioactive isotopes including plutonium. No permanent disposal options currently exist for spent nuclear fuel; it is either stored at the power plant after use or shipped to a temporary holding facility such as Hanford.

Spent nuclear fuel is extremely dangerous, and among the most radioactive materials known. Unshielded exposure to a spent fuel rod can be fatal in a very short period of time. If ingested through air, water or food, spent fuel particles can cause serious radiological or toxic effects on surrounding populations. The dispersal of even a small quantity of this material into the environment by fire and explosion (as happened at Chernobyl on a massive scale) can have dire economic and health consequences which could last for decades or even centuries.

DOE and the U.S. Department of Transportation impose stringent regulations regarding the transportation of spent fuel and other highly radioactive cargoes, which involves the use of special casks. Substantial debate exists, however, whether such regulations and procedures can reduce the risk of accident to a level of insignificance. In the past, environmental organizations such as Greenpeace have disputed DOE's assessments of the safety of shipping large quantities of spent fuel over waterways, rail and highways.

### **Why are We Taking The Spent Fuel Back From Foreign Countries?**

Starting with the "Atoms for Peace" program in the 1950s, the United States provided thousands of kilograms of highly enriched uranium (HEU) atomic fuel for foreign research reactors in about 28 countries. The fuel was sent as part of a deal to assist countries in the "peaceful" development of atomic energy if they

agreed to forego development of nuclear weapons. The United States, in effect, "leased" the fuel to these foreign users with the understanding that the fuel would be returned to the United States after use.

In 1978, DOE established a program to assist these countries in converting atomic plants from HEU to low-enriched uranium (LEU). Unlike HEU, LEU cannot feasibly be used as source material for atomic weapons. However, both LEU and HEU fueled reactors produce plutonium as a byproduct, which can be used to make nuclear weapons.

No U.S. origin HEU or LEU has been transshipped (returned) to the United States since 1988, except for limited "urgency" shipments through either Charleston or Hampton Roads. In most countries, spent nuclear fuel (both HEU and LEU) is being stored at the reactor sites. DOE's proposal is to remove this material from the reactor sites, return it by sea through among ten selected ports of entry (including Concord NWS), and transport the material to one of five temporary storage sites. Concord NWS is slated as an entry port, and not as a long term storage site.

The principal reasons given by DOE for seeking return of the spent fuel are:

- (1) The United States is contractually obligated to dispose of the spent fuel under international agreements; and
- (2) The action is necessary to support American non-proliferation policy by preventing diversion of spent fuel for weapons use, particularly spent fuel containing LEU. However, DOE is continuing to sell user countries LEU fuel and encouraging these nations to continue operating the plants rather than decommission them.

**Are There Alternatives to Returning the Spent Fuel To The United States?** Yes. Western States Legal Foundation and Greenpeace, among other organizations, support the sequestration of spent fuel within the user nations under international supervision until a permanent disposal option is realized, for the following reasons:

- (1) The spent fuel is most susceptible to accident or loss during transportation by sea, air or truck. The greatest safety and

security over these materials can be realized by stringent on-site security and moving the material as little as possible.

- (2) There exists no permanent disposal option for spent nuclear fuel. Movement of foreign spent fuel to Hanford, the Nevada Test Site or other alternative locations will only be temporary, and further transportation will be required. All of the proposed sites already have enormous existing environmental problems.

- (3) Recipients of most of the HEU research reactor fuel shipped overseas are sophisticated nations such as Sweden, (West) Germany, and Japan. They are fully capable of complying with a regime of international supervision.

#### **What Are The Potential Impacts To Concord and Contra Costa County?**

Concord NWS already handles conventional and nuclear weapons, but has not dealt with large quantities of spent nuclear fuel. It is not known whether Concord NWS has the capacity or special facilities for handling or temporarily holding (for shipment) significant quantities of casked spent fuel.

The principal impacts to Concord, Contra Costa County, and other communities near transportation routes are at least two fold:

- (1) The first is the potential health and economic risk to the local population that would result from a credible accident involving spent nuclear fuel either at Concord NWS or along transportation routes (including ship movement through San Francisco Bay). Any proposal to bring spent nuclear fuel through Concord must address all colorable risks, including transportation accidents and seismic events, that are specific to this region.

- (2) The introduction of hundreds or thousands of kilograms of spent fuel into the area will impose a further burden on local emergency response networks managed by state, county and local governments. It is unclear whether DOE is prepared to compensate local governments for this added federal burden.