SEED Coalition Addendum #1– Regarding the Studsvik Application

In addition to the comments submitted, SEED Coalition has the following comments on the Studsvik import application:

SEED Coalition recommends that the Compact Commission not approve this or any other applications for the importation of radioactive waste until the Commission devises a system for prioritizing applications that takes into account annual and lifetime limitations on volume and activity.

Separate applications should be made by Studsvik for radioactive waste that is currently in storage at the WCS site and for additional waste that would come from Studsvik. Waste stored at this site is of higher concern.

Assuming that the site has actually reached dry conditions and that real financial assurance has been put in place, radioactive waste that is in storage at the site should be prioritized for disposal.

The Commission should find out what kinds of containers the Studsvik waste is in, whether they meet guidelines for disposal and whether they are in adequate condition at this time. The waste has already been stored longer than its originally authorized time limit, and the TCEQ extended the time allowed.

However, the Compact Commission should urge additional inspections of all waste in storage shortly before disposal occurs. In a previous inspection at the site there was rust found on the LSA storage pad. Inspections at the time were also found to be inadequate, so proper inspection techniques should be arranged beforehand and checked by an independent auditor.

It could be tragic if waste was buried in storage containers that were inadequate or in poor or rusty condition. Radioactive contamination must be prevented.