



**TESTIMONY
LEAGUE OF WOMEN VOTERS OF TEXAS
TEXAS LOW-LEVEL RADIOACTIVE WASTE DISPOSAL COMPACT COMMISSION
MAY 30, 2019**

I am Susybelle Gosslee, testifying as a member and on behalf of the League of Women Voters of Texas, regarding the Waste Control Specialist's (WCS) transportation and storage process and site in Andrews County, Texas. We appreciate the opportunity to appear before you today. Thank you for allowing me to share the League of Women Voters of Texas position.

The League supports policies that incorporate adequate environmental and public health safeguards. We have several issues to be presented to you now to ensure adequate environmental and public health safeguards.

First: The League does not support having high-level radioactive waste transported to Texas and stored here, because the environmental, public health and financial risks to the state and the people are so great. If no other state wants it, why would Texas want it! High-level radioactive waste is a liability, not an asset to the people of Texas.

Second: The League does not support an increase in low-level radioactive waste volume or curies at the WCS site.

Third: A "contingency plan" is being developed by this Commission to plan for emergencies. The League supports a well-thought-out contingency plan using the most up-to-date and best practices, policies, and procedures for radioactive waste transportation and storage safety. Other state and federal agencies should be informed of the Commissioners' development of the plan and asked for their recommendations to ensure the greatest safety. The plan should clearly define a system that involves all the different agencies in the state working in any kind of operation, accident, or hazardous condition. The contingency plan should designate a contact person with clear lines of authority, be well publicized to all the agencies which might address accidents or hazards, and include training for all the agencies' personnel.

To ensure optimal safety, the person with the most authority to oversee the system should consider the whole radioactive waste system in Andrews County, including the nearby nuclear facilities in New Mexico. There are many agencies overseeing the different components on the WCS site and the surrounding area, and there needs to be coordination among them. An accident could be devastating. Each of the overseeing agencies has a responsibility to work with all the area sites' management. Because there are various hazardous radioactive wastes and byproducts, including Department of Defense radioactive waste, corrosives and explosives, transuranic waste and other dangerous materials stored in the area, crisis management is not an option. For example, some materials stored at WCS must be particularly dangerous, because they can not be moved back to the WIPP site. In addition, URANCO's uranium enrichment plant is only a few miles away. An accident there

could impact the operations and storage at WCS and other operations in the area. The writers of the contingency plan should consider each distinct individual and co-located facilities on and near the WCS site.

Fourth: Every business in the area has the responsibility to operate with the highest standards, with policies and procedures to protect themselves, the area and its residents, and the state. The oversight of each of the facilities should be at the highest levels to ensure environmental and public safety, and cost-cutting measures that diminish safety should not be allowed.

Fifth: Financial assurances need to be increased because the costs of remediation could be more than originally estimated. The members of the Commission might argue that the TCEQ has responsibility for setting the financial assurances; yet the Commissioners could work with them by writing a letter to the TCEQ to bring this concern to their attention. Continued communication ensures that the protections are put in place to protect the state.

Sixth: The League does not support having high-level radioactive waste transported through and to Texas from other states or from international facilities. But let us step back to 2003 when WCS originally proposed Texas as the dumping site for the Compact States. The original approval was to store the low-level radioactive waste from three states and not to include more states or higher grades of nuclear waste; but since then, WCS has made repeated requests for higher levels of curies, larger volumes of radioactive waste, storage of waste from throughout the country, while seeking a license to store high-level radioactive waste from throughout the country and seeking to get out of payments to the state. With that history, what will they ask for next? It is possible that the management could ask for international waste.

Seventh: What will happen if the existing company stops the operation of the site? The possibility exists. How will the Commission address this issue? What is the contingency plan? The Compact Commission document states that the state of Texas will manage the site. The state owns the land. How will the state manage the disposal operations at the WCS site if another management company is not found? What will be the cost?

The NRC may license WCS to take high-level radioactive waste, which could then be transported by truck and train across many thousands of miles of railways and highways, raising the threat of an accident or an attack that would expose Americans to deadly levels of radiation. The transportation routes literally cut through city centers, including train tracks that essentially run along interstate highways. Studies show that there would be measurable radiation emissions within a half-mile on both sides of the railroad tracks. An accident or attack on the transportation vehicles could be catastrophic to communities nearby.

The dumpsite itself has its own liabilities. Due to its geology close to the Ogallala Aquifer, hydraulic fracturing nearby, and the lack of containers that last for thousands of years, there is an inherent risk of radiation leaking into the groundwater supplies and into the atmosphere. The unshielded waste is so dangerous that ten years after the high-level radioactive waste has been removed from a nuclear reactor, it would still emit a lethal dose of radiation within 70 seconds to someone unshielded standing near it.

Thank you for your attention. **For additional information, please contact: Susybelle Gosslee, Hazardous Waste Issue Chair, sgosslee@airmail.net, 214-732-8610.**

The League of Women Voters of Texas (LWVTX) is a nonpartisan citizens' organization that has fought since 1919 to improve our government and engage all citizens in the decisions that impact their lives. It represents more than 7000 members and supporters throughout Texas.

The League of Women Voters never supports or opposes candidates for office or political parties. The member-driven organization of women and men encourages the informed and active participation of citizens in government and seeks to influence public policy through education and advocacy of positions based on extensive issue study and consensus.