

# PUBLIC SUBMISSION

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Holtec International HI-STORE Consolidated Interim Storage Facility Project

**Comment On:** NRC-2018-0052-0058

Holtec International HI-STORE Consolidated Interim Storage Facility Project

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## General Comment

RE: Docket ID NRC-2018-0052

I DO NOT APPROVE OF TRANSFER OF USED NUCLEAR MATERIALS TO SO-CALLED  
CENTRALIZED OR CONSOLIDATED INTERIM STORAGE FACILITIES

I do not approve or consent to the proposal of Holtec International/Eddy-Lea Energy Alliance, the rest of the nuclear power industry, the U.S. Nuclear Regulatory Commission (NRC), and the U.S. Dept. of Energy (DOE) to so-called (so-called centralized or consolidated interim storage facilities (CISFs, also known as MRS) which would transfer responsibility and costs from nuclear plants to taxpayers. Transportation of nuclear wastes whether on water or land poses unacceptable hazards and proposed interim storage facilities saddle particular populations with radioactive risk impacts to health, safety, and the environment.

TRANSPORTATION BY BARGE ENDANGERS WATER SUPPLY FOR MILLIONS, FISHING AND  
RECREATION BOTH INLAND AND IN OCEANS.

I do not approve of or consent to transportation of nuclear waste by water. If the shipping container is breached a radioactive release could be disastrous and infiltrating water could spark a nuclear chain reaction, if a critical mass forms, due to the fissile U-235 and Pu-239 present in the waste.

TRANSPORTATION ON LAND ENDANGERS CITIES AND OTHER POPULATIONS,  
AGRICULTURAL AREAS, AND DRINKING AND RECREATIONAL WATERS

I do not approve of or consent to transportation of nuclear waste by land. Dangers include high-speed crashes, crushing loads, fires, falls, submersions, collapsing transport infrastructure, or intentional attack by explosives, such as anti-tank missiles or shaped charges, any of which could release into the environment great amounts of hazardous radioactivity. Holtec has indicated it can accommodate any and all cask models at its CISF, thus waste shipments on interstate highways could be made.

#### ALL INTERIM STORAGE SITES ARE UNACCEPTABLE, PARTICULARLY THESE WHICH WOULD EXACERBATE ENVIRONMENTAL DANGERS AND TARGET LOW-INCOME AND MINORITY COMMUNITIES

I do not approve of or consent to any site being selected to be an interim nuclear waste dump not only because of the foregoing-cited dangers, but also because sites currently or recently-considered include nuclear power plants, radioactive waste dumps, and Department of Energy sites, which are already heavily contaminated with radioactivity and burdened with highly radioactive waste, and include Southeast New Mexico/West Texas borderlands, communities with very large Hispanic populations, which are already heavily polluted by widespread fossil fuel and nuclear industries. Holtec's CISF would contribute significantly to these nuclear sacrifice zone radioactive risk impacts to health, safety, and the environment. Environmental justice demands the Holtec/ELEA CISF be stopped.

#### HARDENED ON-SITE STORAGE (HOSS) OF NUCLEAR WASTE IS NEEDED TO AVOID RISKS OF HIGHLY RADIOACTIVE WASTE STORAGE POOLS

The U.S. National Academies of Science and researchers such as Princeton University's Von Hippel and Schoeppner have confirmed that irradiated nuclear fuel storage pools at reactors across the country are at risk of fires that could unleash catastrophic amounts of hazardous Cesium-137 into the environment over a wide region. Hundreds of environmental and public interest groups representing all 50 states have called for expedited transfer of highly radioactive waste, from vulnerable pools, into hardened dry casks, designed and built to last for centuries, without leaking, safeguarded against accidents and natural disasters, and secured against attack. This hardened on-site storage (HOSS) should be done as close to the point of origin as possible.