

# 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

ID: NRC-2018-0052-0058 on Holtec's proposed spent nuclear fuel (SNF) facility in NM

I am writing to oppose Holtec's SNF facility on multiple grounds:

Re Holtec:

Holtec SNF canisters are substandard. The sealed internal canisters are welded shut, thus lacking double lids which can be opened to check the status of the SNF. They need to be opened and checked before transport. So, moving the Holtec casks to NM is probably illegal, as well as dangerous. Without a double sealed lid, there can be no pressure monitor to check for problems before there is a radiation leak. Holtec systems lack continuous radiation and temperature monitoring, too. Holtec inner canisters are thin (1/2 thick) and underground they will corrode even more quickly. The salty ground-environment around Laguna Gatuna will further speed up the corrosion. Even if slightly thicker, it is insufficient. The aluminum baskets cause corrosion inside the canisters. Holtec has demanded and received endless exemptions to their certificate of compliance.

Holtec engaged in bribery-kickbacks at TVA, apparently to get contracts. Even though their first contracts came through apparent bribery, they have been allowed to continue to sell to TVA and expand their business. Whistleblower Oscar Shirani said that Kris Singh offered him a job in exchange for stopping his critiques of the Holtec canisters, which he called garbage cans.

Holtec is privately owned & so we dont even know for certain who owns it & so its virtually impossible to get info on them, apart from their web site. Even US govt attorneys were unable. How can a company about which almost nothing is really known & which hides info from both the public and US attorneys be allowed

to handle US nuclear waste?

Holtec-Singh have refused to work with the US govt on determining real costs of spent nuclear fuel canister-casks.

US Attorneys complained: Holtec should not be able to use a highly regulated and publicly funded industry to make profits, but to refuse to provide information about the cask business when the information it possesses about cask costs are an integral part of the damages claimed by the plaintiff in this case. When faced with damages of the magnitude of those being claimed by ComEd, it is imperative that we determine the reasonableness of these claims against the Federal Treasury. COMMONWEALTH EDISON COMPANY, Plaintiff, v. No. 98-621C Judge Hewitt UNITED STATES, Defendant, Case 1:98-cv-00621-ECH , Document 288 , Filed 03/12/2004, p. 6

Holtec frivolously claims proprietary rights to block both the public and even US Attorneys from accessing info of critical importance.

Holtec is using foreigners on H1B visas to do important engineering work. See labor certification registry on DOL web site. Where their qualifications are known, they are not the best. Holtec has made no real effort to recruit talent. As non-citizens it will be more difficult to hold them liable. As non-citizens they are less likely to have the good of the USA in mind. Kris Singh, himself, was born in India & can easily disappear back there when his SNF cans rupture-explode. However, utilities-US govt-taxpayers have so grossly overpaid him that he has probably bought an island elsewhere.

Holtec is hiding 144 pages about cultural sites, proving that they can't be trusted.

It is unacceptable to have SNF casks visible from air, whether buried or above ground, they need a building to cover them - preferably a thick concrete bunker with radiation monitoring equipment. A crashing plane can burrow into the ground.

Re the NM site:

The area has birds protected under the migratory bird act. And, "There are three species considered Species of Concern within the habitat near the Site. These include the Lesser Prairie Chicken (*Tympanuchus pallidicinctus*), the Sand Dune Lizard (*Sceloporus aerinicolus*), and Gypsum wild-buckwheat (*Eriogonum gypsophilum*)." Eddy Lea Siting Study Contract No: DE-FG07-07ID14799

It has historically significant American Indian sites, which are ca. 1300 to 8000 years old.

Laguna Plata was formed by subsidence & so Laguna Gatuna must have been created by subsidence - karst dissolution.

The region is prone to karst-sinkholes. The site itself lies upon the Capitan Reef system, noted for huge sinkholes.

There is a potash mining concession under the site. Mining under the site could destabilize it, creating subsidence or sudden collapse-sinkholes. The same can be said for the multitude of oil & gas wells, old & new, including fracked ones, in the area.

Rather than being given this contract, the assets of Kris Singh, Holtec, & any other Holtec owners should be immediately seized & used to build facilities to transfer the spent nuclear fuel, at each nuclear reactor site, from Holtec canisters, to safer systems, which are thicker and have lids which can open so that the spent fuel

can be checked-monitored. The same is true for Areva.