

Holtec-CISFEISCEm Resource

From: David King Dunaway <dunaway@unm.edu>
Sent: Thursday, July 26, 2018 1:49 PM
To: Holtec-CISFEIS Resource
Subject: [External_Sender] Holtec International Project for Interim Storage of Spent Nuclear Fuel

July 26, 2018

To: U.S. Nuclear Regulatory Commission
From: David K. Dunaway, New Mexico resident
Re: Holtec International Project for interim storage of spent nuclear fuel

I am writing to oppose Holtec International's plan to create an interim storage facility in southern New Mexico for spent nuclear fuel. I understand that according to federal law, before Holtec can be awarded the project, the NRC must perform an environmental impact study that demonstrates the project would not cause harm to the environment or local communities. According to the NRC's public meeting in Albuquerque, the goal is to explore a broad range of impacts, not just to the natural environment, but to the health and well-being of the populations affected. Since this project would involve aggregating spent nuclear material from across the entire country and transporting it by train to southern New Mexico, where it would be stored above ground for an indefinite period of time, its potential impacts transcend the local community of Carlsbad-Hobbs, to include the rest of the state, the Southwest region, and the nation as a whole. There is little to be gained from this project and a tremendous amount to be lost.

Here is a brief list of reasons why the Holtec project should not go forward:

1. Single-site intermediate storage is a bad idea.

- The farther it is shipped, the more chance of transportation accidents
- Moving it twice (to intermediate and then to permanent storage) doubles the chance of human error and transportation accidents
- The more the material is handled to prepare it for shipment beyond the point of production, the more chance of human error
- There is so much spent fuel at nuclear power plants across the country that it could more than fill up Yucca Mountain now, so even if Yucca Mountain does come back on line, it won't be sufficient to store all the nation's spent fuel
- Concentrating so much spent fuel at a single site makes it a ready target for terrorists

2. Nuclear waste, with such a long radioactive half-life, requires that production, use, and storage be regulated through careful community planning at the national, state, and local levels.

- The Holtec project is not part of an integrated plan; too many essential aspects such as transportation safety and the location of permanent storage have yet to be worked out
- The Holtec project is being rushed through without adequate input from all of the communities that will be affected by it
- Holtec's website, which states that there is uniform support for the project, misrepresents the actual amount of community opposition

3. The proposed site in southeastern New Mexico is inappropriate.

- The geology of the area, mostly sandstone and limestone, is not sufficiently stable to store the material. There is already a growing sink hole near Carlsbad, close to where the project would be located, and the geologic instability is worsened by the hydraulic fracturing nearby.
- New Mexico is far from the nuclear facilities that generated the material, most of which that are on the East and West coasts, so it will have to be shipped great distances, often through large population centers. This exacerbates the transportation issues noted above. Already the Albuquerque City Council has resolved not to allow this material to be transported through our city, and many other communities may follow suit.
- New Mexico, as one of the poorest states in the nation, has a particularly inadequate rail and road infrastructure and lacks the funds to improve it. WIPP needed heavy investment (such as the Santa Fe bypass) that was only possible because it came through federal dollars and was mostly oriented to one site (Los Alamos). Unless similar federal commitments are made to develop transportation routes across the state, the project will be very dangerous to New Mexico communities.
- Positioning the storage site so close to WIPP is a bad idea, because it increases the potential of terrorist attacks to knock out both facilities together.
- The proposed site is quite close to the rich petroleum deposits that are bringing considerable hydraulic fracturing to the region. The long-term potential for geological destabilization in the area is so threatening that the oil and gas industry has come out against the Holtec project.
- Our state would lose much more revenue from a decline in oil and gas production, which the project could negatively impact, than it would receive from whatever taxes Holtec pays to the state.

4. Long term nuclear storage needs to be administered by the government rather than a private company.

- To remain in business, companies such as Holtec must maintain their profit levels and prioritize the economic interests and needs of their shareholders over all other values, including community well-being.
- To store nuclear material with a radioactive half life of thousands of years, there must be the assurance that the agency storing it will be in operation in perpetuity, something that private companies cannot guarantee (governments can't either but the chances are better).
- New Mexico has paid a high price when mining companies have ceased operations or gone out of business and left environmental destruction in their wake. There is no guarantee that Holtec will not do the same.

In short, Holtec International's plan to create an interim storage facility in southern New Mexico for our nation's fuel is irresponsible and dangerous. It is your responsibility to make sure that it doesn't happen again.

New Mexico might get a few jobs from this project in the short run, but the risk and the potential long-term damage is great to justify the risks involved.

We are counting on you!

With many thanks for protecting us from this project,

DD

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