

## Holtec-CISFEISCEM Resource

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**From:** Cheryl Gross <honey4086@comcast.net>  
**Sent:** Thursday, July 26, 2018 4:16 PM  
**To:** Holtec-CISFEIS Resource  
**Subject:** [External\_Sender] COMMENT TO the NRC on Docket ID NRC-2018-0052: Holtec International's HI-STORE Consolidated Interim Storage Facility Project

Dear Nuclear Regulatory Commission Staff:

Before offering comments, I have a question. I was under the impression that US federal law prohibits centralized or consolidated interim storage sites if the Department of Energy and US taxpayers are expected to own and transport the waste. Is that not the situation with this proposal? If it is, Holtec International's application for a Consolidated "Interim" Storage Facility (CISF) for high level nuclear waste should be rejected without further consideration. Assuming the project is not prohibited by law, I have the following comments:

As a scientist, I find this project not only without merit, but offering so much obvious potential disaster as to not deserve further evaluation. Should for some reason the NRC proceed with an evaluation:

1. Since it is the public that will be impacted by this project, the public has the right to know all the details. Holtec must not be allowed to "black out" much of the application as corporate secrets, concealing crucial information from public review.
2. Based on past performance, Tetra Tech cannot be trusted to accurately assess the environmental impacts of the proposed Holtec project. According to the US Navy, EPA and California Health Department, the company has falsified radiation monitoring data, knowingly spread radioactive soil and waste on previously clean places on and offsite, used unqualified workers to supervise radioactive scanning and cleanup effort, and suppressed and fired whistleblowers at the Navy's huge Hunters Point nuclear site in San Francisco. A competent, unbiased, ethical firm must be used to perform the environmental assessment and create the EIS.
3. The proposed site location is inappropriate. Valuable farming and ranching operations would be threatened by the storage itself, and farms, ranches, businesses, industries, communities and natural areas through which the waste was transported to reach the site would be placed at serious risk.. All these potential impacts, including WCS, must be addressed.
4. This state has been victimized by the nuclear industry for decades, with people of color disproportionately impacted. Abandoned uranium mines, the Manhattan Project, Trinity Test, plutonium contamination in the rivers downstream from Los Alamos, uranium enrichment, and the nation's transuranic waste at the Waste Isolation Pilot Plant are among the multiple stresses on New Mexicans, who have never been compensated. The social justice aspects of the project must be addressed.
5. The nation's infrastructure and the infrastructure locations are not suitable for transporting the waste to the proposed site. Tens of 1000's of shipments of deadly radioactive waste in extremely heavy, inadequate containers would be moved over already deteriorating railroad tracks, roads and bridges and through many communities. Waste shipments to Holtec would threaten most of the country with ongoing, intensely radioactive transports through nearly every state for decades to come. And if the waste storage at Holtec really is "interim," that same waste will have to be moved again to a permanent storage site after that, meaning there will be 40-50 more years of transport. The potential

impacts from many thousands of shipments on already unsound infrastructure, as well as on communities, businesses, the environment and resources all along the way are overwhelming but must be evaluated.

6. There are no certified waste containers designed for real world transport conditions and none have been physically tested for these types of transport. The promoter has instead used outdated videos on totally different casks. The storage containers cannot be monitored for potential cracks and leaks, inspected, repaired or replaced and the dangerous waste will outlast the casks' integrity. The technology for such casks is in the "future" according to NRC staff. It hasn't been determined what effect the climate, weather events, nearby fracking and other environmental factors will have on the inadequate casks and the waste should the casks fail. The impacts of environmental factors on the casks must be determined, the life-spans in relationship to the storage period identified and the system for addressing cask failure and preventing the leakage of radioactive materials stated in detail.

7. There is a vast array of possible impacts from both the transportation and the storage of the waste. Responding to a nuclear waste disaster isn't something most emergency response teams deal with. Emergency notification systems and response systems and personnel along all the transport routes and serving the storage site must be carefully evaluated with regard to their reliability, staff training, equipment and ability to handle and all of these potential impacts. If found lacking, the manner in which they will be rendered capable must be addressed.

8. The site isn't designed for permanent storage, but a permanent site or the resources to move the casks again may not be found. Although this proposal is for "temporary" storage of up to 173,600 metric tons of high-level, consolidated nuclear waste, NRC must analyze the consequences of the waste potentially remaining indefinitely at the site.

9. Reprocessing was previously proposed at this same site, and consolidating waste is the first step toward extracting plutonium. NRDC must evaluate the possibility of reprocessing at the site and the impacts it would have.

If approved and implemented, this project would be a disaster waiting to happen, and the wait would not be long. I urge you to reject this insane proposal without further consideration.

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