

## Holtec-CISFEISCEm Resource

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**From:** Joan Brown,osf <joankansas@swcp.com>  
**Sent:** Thursday, July 26, 2018 5:30 PM  
**To:** Holtec-CISFEIS Resource; joan m brown  
**Subject:** [External\_Sender] High Level Radio Active Waste Comment Period---New Mexico  
**Attachments:** faith leader holtec letter to NRC and legis March 19, 2018 reformatted.pdf; Faith letter Catholic Sisters.pdf

Please see the attached letters and comments regarding the High Level Nuclear Waste Storage Facility Comment Period that ends July 30. Please let me know that you have received these comments.

Peace and good,

Sr. Joan Brown,osf

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Joan Brown,osf  
Executive Director  
New Mexico Interfaith Power and Light (NMIPL)

New Mexico Interfaith Power and Light  
PO Box 27162  
Albuquerque, NM 87125  
505-266-6966 [www.nm-ipl.org](http://www.nm-ipl.org) [info@nm-ipl.org](mailto:info@nm-ipl.org)

1004 Major Ave. NW.  
Albuquerque, NM 87107  
[joanbrown@nm-ipl.org](mailto:joanbrown@nm-ipl.org)

"There is no inner world without the outer world." Thomas Berry, Author of The Great Work

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**Federal Register Notice:** 83FR13802  
**Comment Number:** 2492

**Mail Envelope Properties** (07d2ebec-a5f0-23a9-653a-cd632e3a975b)

**Subject:** [External\_Sender] High Level Radio Active Waste Comment Period---New Mexico  
**Sent Date:** 7/26/2018 5:30:11 PM  
**Received Date:** 7/26/2018 5:30:24 PM  
**From:** Joan Brown,osf

**Created By:** joankansas@swcp.com

**Recipients:**

**Post Office:** swcp.com

Files	Size	Date & Time	
MESSAGE	738	7/26/2018 5:30:24 PM	
faith leader holtec letter to NRC and legis March 19, 2018 reformatted.pdf			200255
Faith letter Catholic Sisters.pdf	86367		

**Options**

**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**



## **New Mexico Interfaith Power and Light**

PO Box 27162, Albuquerque, New Mexico 87125\*\*[www.nm-ipl.org](http://www.nm-ipl.org)\*\*[info@nm-ipl.org](mailto:info@nm-ipl.org)\*\*505-266-6966

July 2018

To: Rick Perry, Secretary, Department of Energy  
Kristine L. Svinick, Chairperson, Nuclear Regulatory Commission  
Members of the New Mexico Congressional Delegation

Dear Mr. Secretary, Madam Chairperson, and Members of Congress:

We are faith leaders from many religious traditions, and from many diverse communities in New Mexico. We are greatly concerned about an issue that will affect our communities, our future generations, and the wonderful state we call “home.” As Pope Francis stated in his 2015 encyclical addressing climate change and the economy, “As faith leaders we take seriously the responsibility to help discern what is equitable, just, and for the common good of Our Common Home.”

Our concern is about a license application by Holtec International for the Consolidated Interim Storage of high-level radioactive waste that the Nuclear Regulatory Commission (NRC) will consider. As stated in the license application, this proposed project would allow the storage of 110,000 tons of spent nuclear reactor fuel from nuclear power plants in 35 states. The proposal is for a shallow sub-surface burial system in Lea County between Carlsbad and Hobbs. This facility would store the spent fuel currently at the power plants as well as the spent fuel from what is currently in use and projected for future years.

We are concerned that the decisions to approve this project will be made without adequate time for communities to understand the project and voice their concerns. Some of the issues are:

1. The safety of the transportation of the spent fuel on highways and railroads through communities. Also, since this is a “storage” site and not a “disposal site” like the Waste Isolation Pilot Plant (WIPP), at some future point the spent fuel will need to be removed and sent to a disposal site, thus doubling the transportation risk.
2. The safety of the operations at the site during construction and operation. Spent fuel is many thousands of times more radioactive than the waste disposed of at WIPP.
3. Assurance that The State of New Mexico will not have to shoulder the cost of railways, roads, accident mitigation and recovery, and future clean-up and decommissioning of the site. The operating entity is likely to be Holtec Government Services, LLC, a Limited Liability Corporation (LLC) and as such is protected from many of the financial consequences of failure. If their corporation dissolves, who is stuck with the bill? New Mexico does not have the resources for this.
4. The public has been unable to obtain information from the NRC regarding Holtec Government Services, LLC compliance with regulatory requirements, safety performance, and financial responsibility in their existing operations. Holtec has no current presence in New Mexico so their corporate ethics are unknown.
5. When the people of New Mexico agreed to the WIPP Site they were promised that New Mexico would not store high-level nuclear waste. The Federal government has been unable to agree on a disposal site for the permanent disposal of spent nuclear fuel, and given that history we are concerned that the “storage facility” here will become a de-facto disposal location.

6. There is also an environmental justice concern for this project. We already have a large number of industrial activities which can pollute our air, land, and water and pose potential failure risk. Our citizens, many of whom are Hispanic, bear a disproportional amount of risk as citizens of New Mexico living in the communities where environmentally risky operations take place.

7. We are concerned that the NRC does not have the resources or presence to adequately monitor or regulate the construction or operation of this facility. The NRC has no current presence in Southeast New Mexico. The WIPP site is overseen by the Department of Energy (DOE) which has decades of presence in New Mexico.

8. Waste Control Specialists, LLC has already started the development of a storage facility for spent nuclear fuel near the Texas/New Mexico border near Eunice, NM. This raises the question of the economic viability of this project since a competitor is already started.

Our religions have ancient roots, and this ancient wisdom calls us to protect and care for Creation and Community. One passage in the Judeo-Christian tradition from the Book of Deuteronomy calls us to be responsible and to engage in these issues: "Today, I have set before you life and death, blessing and curse. Therefore, choose life that you and your children may live."

Please take action to ensure that all concerns for the risk of this project are in the open, receive public scrutiny, and receive due consideration.

Thank you for the consideration of our request.

Undersigned Faith Leaders and Organizations:

Rev. Susan Quass, Executive Director  
New Mexico Conference of Churches

Bishop David Bailey, Episcopal Church Navajoland  
Farmington, NM

Sr. Joan Brown,osf, Executive Director, NM Interfaith Power & Light  
Albuquerque, NM

Sr. Rose Marie Cecchini, MM, Director, Office of Life, Peace, Justice &  
Creation, Catholic Charities of Gallup Diocese, Gallup, NM

Rev. Dr. William M. Lyons, SouthWest Conference Minister  
United Church of Christ

Rev. Nick King, Mennonite Pastor  
Carlsbad, NM

Rev. Stephanie Harmon, Methodist Chaplain  
Carlsbad, NM

Rev. Marty Singleterry, Pastor, St Peter Lutheran  
Retired Methodist Superintendent, Carlsbad, NM

Rev. Gene and Ellen Harbaugh, Retired Presbyterian Minister  
Carlsbad, NM

Rev. Stephen A. Gaertner, O. Praem., Associate Pastor, Holy Rosary Parish  
Albuquerque, NM

Betty Jo Nye, President, Albuquerque District  
United Methodist Women

Fr. Tom Smith OFM Conv., Director, Holy Cross Retreat Center  
Mesilla Park, NM

Fr. Richard Rohr, O.F.M., Center for Action and Contemplation  
Albuquerque, NM

Fr. Gene Gries, O. Praem, Maria de la Vid Norbertine Abbey  
Albuquerque, NM

The Rev. Holly Beaumont, D. Min., Organizing Director  
Interfaith Worker Justice – NM

Fr. Warren, J Broussard, S.J., Immaculate Conception Church  
Albuquerque, NM

Linda Popelish, Gallup's Morning Light Sangha  
Jamestown, NM

Sister Catherine Clemons  
Gallup, NM

Rev. Virginia Bairby, Pastor, First Presbyterian Church  
Taos, NM

Rabbi Paul J. Citrin  
Albuquerque, NM

Sr. Marlene Perrotte, rsm, Legal Immigration/Assylum Ministry  
Albuquerque, NM

Lynn R. Anner-Bolieu, Deacon (Ret.), Episcopal Church of Navajoland  
Reside in McKinley County, NM

Rev. Pamela Shepherd, Pastor, Taos UCC  
Taos, NM

Judy Traeger, JustFaith Facilitator, St. John XXIII  
Catholic Community, Albuquerque, NM

Rev. Larry Bernard, ofm, Pastor, San Diego Mission  
Jemez Pueblo, NM

Kathleen Mezzoff, Elder, Westminster Presbyterian Church  
Gallup, NM 87301

Sr. Diana Wauters, Sisters of the Assumption  
Chaparral, NM

Rabbi Harry Rosenfeld, Congregation Albert  
Albuquerque, NM

Rev. Jean Siegfried Darling, Minister Emerita, Peoples Church of Chicago  
Cerrillos, NM

Rev. Harry Ebert, Pastor, First Presbyterian  
Santa Fe, NM

Rev. Andrew Black, Pastor, First Presbyterian  
Santa Fe, NM

Rev. Sarah Tevis Townes, Pastor and Teacher, Church of the Good  
Shepherd UCC, Albuquerque, NM

Rev. Gail Marriner, Pastor, Unitarian Universalist  
Santa Fe, NM

Rev. Tiffany Curtis, Pastor, First Christian Church  
Santa Fe, NM

Rev. Sue Joiner, Pastor, First Congregational United  
Church of Christ, Albuquerque, NM

Rev. Erica Lea-Simka, Albuquerque Mennonite Church  
Albuquerque, NM

Pastor Anne Morawski, Evangelical Lutheran Church in America  
Associate in Global Mission

Jutta Stonawski, Teacher of the Gifted  
Gallup, NM

Rev. John Dear  
Santa Fe, NM

Fr. Frank A Quintana, Pastor of Bl. Oscar Romero Catholic Comm.  
Albuquerque, NM

Rabbi Nahum Ward-Lev, Temple Beth Shalom  
Santa Fe, NM

Mary Ellen Gonzales, Board of Trustees, Unitarian Universalist  
Congregation of Santa Fe

Rev. Jeremiah Griffin, Pastor, St. Chad Episcopal Church  
Albuquerque, NM

Rev. Dr. Stephen J. Miller, Disciples of Christ pastor, retired  
Albuquerque, NM

Rev. Anita Amstutz, Anabaptist Fellowship of Alamosa  
Mountain States Mennonite Conference

Rev. Joan Jiko Halifax, Abbot, Upaya Zen Center  
Santa Fe, NM

Rev. Kenneth Cuthbertson, PhD, Presbyterian (USA)  
Albuquerque, NM

Rabbi Neil Amswych, Temple Beth Shalom  
Santa Fe, NM

The Rev. Angela Herrera, Senior Minister, First Unitarian Church  
Albuquerque, NM

The Rev. Ryan W. Roberts, n/OLF  
Albuquerque, NM

Rev. Dr. Bert Scott, United Methodist Church  
Albuquerque, NM

Rev. Sarah Tevis Townes, Pastor and Teacher, Church of the Good  
Shepherd UCC, Albuquerque, NM

Lilly B. Irvin-Vitela, Children Youth & Family Ministries  
First Congregational United Church of Christ, Albuquerque, NM

Mirakhel Windsong, Lay leader, Westminster Presbyterian  
Gallup, NM

Rev. Janet Norden, Pastor, University Heights United Methodist  
Albuquerque, NM

Rev. H. Blaine Wimberly  
Santa Fe, NM

Janet Gildea, SC, Sisters of Charity  
Anthony, NM

Rev Sharon Littrell-Marsh, Ph.D, United Church of Christ  
Southwest Conference

Peggy Deneweth, SC, Sisters of Charity  
Anthony, NM

Carol Wirtz, SC, Sisters of Charity  
Anthony, NM

Rev. Karen Bash, Retired United Church of Christ Minister  
Albuquerque, NM

Rev. Allen Bash, Retired United Church of Christ Minister  
Albuquerque, NM

Rev. Alexander Lenzo+, Priest, St. Francis Episcopal Church  
Rio Rancho, NM

Donna Illerbrun, Principal, St. Therese Catholic School  
Albuquerque, NM

Rev. Talitha Arnold, Senior Pastor, United Church of Santa Fe  
United Church of Christ, Santa Fe, NM

Rev. Jeremiah Griffin, Pastor, St. Chad Episcopal Church  
Albuquerque, NM

Ani Jamgyal, Monastic at Mangala Shri Bhuti  
Albuquerque, NM





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Kristine L. Svinick, Chairperson, Nuclear Regulatory Commission  
Members of the New Mexico Congressional Delegation

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Our lives are committed to service of the Common Good and high ethical and moral principles that lead us to stand in prophetic, if not popular roles. Our ancient roots, and wisdom calls us to protect and care for Creation and Community. One passage in the Judeo-Christian tradition from the Book of Deuteronomy calls us to be responsible and to engage in these issues: “Today, I have set before you life and death, blessing and curse. Therefore, choose life that you and your children may live.”

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Thank you for the consideration of our request.

Undersigned Catholic Women Religious and Organizations:

Sr. Marlys Jax, osf  
Rochester Minnesota Franciscans  
Rochester, MN

Sr. Judy Chiodo, osf  
Rochester Minnesota Franciscans  
Minneapolis Minnesota

Sr. Joyce Stemmer, osf  
Rochester Minnesota Franciscans  
Minneapolis, MN

Carol Warren  
Co-member Rochester Franciscans  
Sacramento, CA

Sr. Pat Keefe, osf  
Rochester Minnesota Franciscans  
Rochester, MN

Marion Kaple  
Co-member Rochester Franciscans  
Atlanta, GA

Sr. Kate Minar, osf  
Rochester Minnesota Franciscans  
Rochester, MN

Mary Kay Flannigan, osf  
Rochester Minnesota Franciscans  
Chicago, Ill

