

Holtec-CISFEISCEm Resource

From: Beata Tsosie-Pena <beata@tewawomenunited.org>
Sent: Tuesday, July 31, 2018 1:12 AM
To: Holtec-CISFEIS Resource
Cc: justin@tewawomenunited.org; Kathy Sanchez
Subject: [External_Sender] TWU Public Comments RE: Holtec International's HI-STORE CIS Facility
Attachments: HOLTEC COMMENTS 2018.pdf

Hello,

Please accept these attached comments on behalf of Tewa Women United. Also, please reply with confirmation they were received.

Thank You,

Beata Tsosie-Peña
Tewa Women United
Environmental Health and Justice Program Coordinator
505-927-1847

Federal Register Notice: 83FR13802
Comment Number: 2506

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Subject: [External_Sender] TWU Public Comments RE: Holtec International's HI-STORE
CIS Facility
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July 30, 2018

May Ma
Office of Administration
Mail Stop: TWFN-7- A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555- 0001

RE: Docket ID NRC-2018-0052; Holtec International's HI-STORE CIS Facility for
Spent Nuclear Fuel, Lea County, New Mexico

To Members of the NRC:

Un'bi' a'gin di/With Your Respect,

We represent a non-profit in Española, New Mexico, called Tewa Women United (TWU). Our mission is to provide safe spaces for Indigenous women to uncover the power, skills, and strengths they possess to become positive forces for social change in their families and communities. This is part of our greater vision to end all forms of violence against Native women, girls, and Mother Earth, and to promote peace in New Mexico.

Please accept these formal comments regarding the amendment of the upcoming issue, regarding Holtec and Eddy Lea Energy Alliance's (ELEA) plans to bring High Level Radioactive Waste from nuclear reactors around the country, to New Mexico. We know that the actions of these two corporations has the potential to bring irreversible damage both to New Mexico and its people. We know the environmental racism and unjust nature that the DOE abide by, which do not consider our most vulnerable populations when determining safety regulations. If the several thousand train carts were to have a potential spill - which is at high risk for terrorist action, leaks, and damage - the deadly radioactive waste sites would have both a deadly and devastating effect for those in the land, and the environment itself. It's also important to add, that the

pathway these radioactive wastes are transported on, would irrevocably affect Indigenous farmlands, people, and way of life. It's almost a guarantee that, after 20 years of transporting the 100,000 metric tons of radioactive waste, a leakage would occur. The Department of Energy even agrees, that even in a minimal leakage scenario, even if one radioactive waste cask were to release a small amount of waste, over a 42-square mile area would be contaminated, and \$620 million would be required to cleanup a rural area, or \$9.5 billion in an urban area.

Our Indigenous Peoples still inhabit the lands that these trains would pass through. Ceremonial lands, farmlands, plants, wildlife, elders, and families, still reside in areas that Holtec and ELEA want to transport radioactive waste through. It is environmental racism that does not allow for the Holtec or ELEA to take into serious consideration our unique worldview, and only prioritize the viewpoint of those enacting the violence and harm. This racism is unjust, and we need your help to put an end to exploitation of public lands at the cost of the health of people, our lands, and our living waters. There is no separation from the health of our environment and the health of Native Peoples.

Our spiritual and Indigenous worldview can no longer be considered "outside the scope" of industry if the human race is to survive the nuclear age. The peoples who exist within New Mexico have been disproportionately impacted for generations from multiple, allowable harms and cumulative exposures over long periods of time. Our way of life must be protected. When will there be restorative, healing justice so that we can help heal this place we are a part of?

It must be recognized that women are the carriers of cultural, spiritual, ancestral, and physical life-ways, passed on through generations. The rape of our lands, and usage of it by big corporations to transport radioactive wastes is not life affirming, and as Tewa women we advocate for an end to the constant barrage of environmental violence on our lands and bodies. These intersections are real and must be taken into consideration when determining land use. It is time to listen and trust the wisdom of Indigenous women in their role as life and caregivers. TWU's campaign to Protect Those Most Vulnerable promotes, Nava T'oi Yiya/Mother Who Works the Land, as a new model of reference in determining environmental safety exposure regulations. When Indigenous pregnant women are protected and put at the center of policy, all of us are protected. This builds off midwife, Katsi Cook's teachings:

"Woman is the first environment. In pregnancy our bodies sustain life. At the breast of women, the generations are nourished. From the bodies of women flows the relationship of those generations

both to society and the natural world. In this way, the earth is our mother, the old people said. In this way, we as women are earth.” - Katsi Cook, Mohawk Midwife.

The health of Indigenous Peoples and their quality of life has been under constant attack since “our land was seized under a set of values that separated the Peoples from the land (Las Mujeres Hablan, Community Summary, CDC, LAHDRA, 2012).” If this site were to become the new and sole Waste Isolation Pilot Plant (WIPP), it would be the sole storage facility of 100,000 metric tons of dangerous waste, for up to 120 years. Being that it also has the potential to become the de facto permanent disposal site for the whole country, it is an alarming threat for indigenous people in this area, for many generations to come. Citizens and policymakers do not even know the routes for this decision, and being that it will likely go into, or near Native reservations, this is our life, our children's' life, our elders' life, at stake.

The southwest was designated as a “sacrifice zone” for the nuclear and energy industry by past administrations, and it is this same attitude that perpetuates the culture of devaluing and disregarding indigenous people and way of life. It is not too late to admit mistakes and begin to heal what has been done.

In 2008, the United Nations Declaration on the rights of Indigenous Peoples (UNDRIP) was created and stated that we - as indigenous people - have rights that “constitute the minimum standards for the survival, dignity and well-being of the indigenous peoples of the world” as well as “the right to the full enjoyment, as a collective or as individuals, of all human rights and fundamental freedoms.”

It must be recognized that women are the carriers of cultural, spiritual, ancestral, and physical life-ways, passed on through generations. The desire to transport radioactive material, and set up a near-permanent radioactive waste storage, near our lands, waters, and ecologies is not life-affirming and will never align with our worldview.

Tewa Women United is reiterating our opposition that Holtec and ELEA plan to carry out. Our request is as follows:

- A centralized and consolidated storage is not needed. The least risky option would be to store fuel - removed from nuclear reactor fuel pools - in dry casks, and to secure them in a generation site nearby.

- Since most reactor sites are licensed to store waste for up to 60 years past decommissioning, it would make moving wastes an unnecessary risk, since these reactor sites are both guarded and monitored.

Furthermore, we'd also like to reiterate our displeasure with Holtec and ELEA from an Indigenous perspective.

- Since there exists the potential for radioactive wastes to both be transported through our homelands, and leak, Holtec and ELEA irresponsibly did not alert or notify Pueblo governments about the risks associated with this transportation and storage process.
- It must also be recognized that if a leak were to happen, that safety guidelines for the cleanup would not be protective of Indigenous and land-based Peoples, whose lifestyle is rooted in the outdoors, whether it would be farming, cattle work, or play. It's especially dangerous for Native pregnant women, the first environment for children and future generations. If these women were exposed, two generations of children would face the consequences of radioactive poisoning.

Our ancestral lands in Northern NM are already contaminated from the nuclear industry, and we know too well, that in the event of toxic exceedance, clean up has never happened. We would not wish the issues we face in our sacred place on any beloved community of New Mexico. There must be a moral stand from all those in power to help protect this special place we all share from any risk of further environmental violence.

Kunda wo ha/ Thank you for your careful consideration and implementation of these comments and our prayers for you all as your agency has a big responsibility towards honest, responsible service to our state.

Tewa Women United
Environmental Health and Justice Program

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