

## Holtec-CISFEISCEm Resource

---

**From:** Barbara Backman <bback@att.net>  
**Sent:** Thursday, July 26, 2018 6:09 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:

Reject Holtec International's application for a Consolidated "Interim" Storage Facility (CISF) for high level nuclear waste first because centralized or consolidated interim storage sites are NOT allowed under US federal laws to the extent the Department of Energy and US taxpayers are expected to own and transport the waste. It is an ILLEGAL DUMP.

Reject and do not rely on the Environmental Report done by Tetra Tech for Holtec. A FRAUDULENT, CROOKED CONTRACTOR should not be doing the environmental analysis. For 20 years Tetra Tech has been falsifying radiation monitoring data, deliberately spreading radioactive soil and waste to previously clean places on and offsite, using unqualified workers to supervise radioactive scanning and cleanup efforts and suppressing and firing whistleblowers at the Navy's huge Hunters Point nuclear site in San Francisco, which is being converted to high-end housing. This is according to the US Navy, EPA and California Health Department. Based on this track record, Tetra Tech cannot be trusted to assess environmental impacts of the proposed Holtec dump.

CASK DANGERS. None of today's certified waste containers are designed for real world transport conditions (temperatures, crash speeds, submersion in deep water) and have not been physically tested despite dump-promoter's misuse of 40 year-old crash-test videos on totally different casks. The storage containers cannot be monitored for potential cracks and leaks, inspected, repaired or replaced even though we know the waste will be dangerous longer than they will last. The technology is in the "future" according to NRC staff. Nuclear Regulatory Commission (NRC) should include evaluation of moving 10's of 1000's of shipments of the most deadly radioactive waste in super-heavy, inadequate containers over deteriorating railroad tracks, roads and bridges...impacts from many thousands of shipments on infrastructure, on people, businesses, communities, resources all along the way

HOTTER HIGH LEVEL WASTE. NRC should include full evaluation of "high burn-up" fuel. It is a significant portion of the waste that would go to Holtec.

EMERGENCY RESPONSE. Assess and report on the reliability and capability of volunteer and distantly-located emergency response personnel upon which the site will rely. Include availability, training, equipping and notification of emergency responders all along the routes.

HARSH ENVIRONMENT. Consider, in more than a cursory dismissive way, the decades of high temperatures, salty dry climate, potential flash floods, lightning, burrowing animals, sand, blocked vents, wind, rain, fire on the casks and waste. Assume increased earthquake risks and other impacts from fracking (which is not prohibited) near and under the site!

CONSOLIDATED "INTERIM" STORAGE (CIS) COULD BECOME PERMANENT. NRC must analyze the consequences of the waste remaining indefinitely at the site...never moving to another location. Holtec proposes to "consolidate" up to 173,600 metric tons of high-level waste from all US nuclear power reactors to New Mexico, near the famous Carlsbad Caverns, to "temporarily" store for 40-120 years. (It could take 40+ years to move it there!) The waste would allegedly

be moved again but if no permanent site is found or money to move it again never appears, it could stay forever, despite not being designed for permanent isolation.

NO MOBILE CHERNOBYL!!!!

Ms. Barbara Backman  
PO Box 1065  
PO Box 1065  
Canton, CT 06019  
8606932538

**Federal Register Notice:** 83FR13802  
**Comment Number:** 2729

**Mail Envelope Properties** (1770726851.1423.1532642947648.JavaMail.tomcat)

**Subject:** [External\_Sender] COMMENT TO the NRC on Docket ID NRC-2018-0052:  
Holtec International's HI-STORE Consolidated Interim Storage Facility Project  
**Sent Date:** 7/26/2018 6:09:07 PM  
**Received Date:** 7/26/2018 6:09:13 PM  
**From:** Barbara Backman

**Created By:** bback@att.net

**Recipients:**

**Post Office:** vweb109

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	3555	7/26/2018 6:09:13 PM

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