

## Holtec-CISFEISCEm Resource

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**From:** Protecting NM From All Things Nuclear <protectnewmexico@gmail.com>  
**Sent:** Tuesday, July 31, 2018 1:51 AM  
**To:** Holtec-CISFEIS Resource  
**Subject:** [External\_Sender] Docket ID NRC-2018-0052 \_ NISG \_ PDF 3 of 72  
**Attachments:** NRC-2018-0052\_NISG-3.pdf; ATT00001.htm

Nuclear Regulatory Commissioners,

The Nuclear Issues Study Group (NISG) has mailed 3 boxes with a total of 5,112 Public Scoping Comments re: Docket ID NRC-2018-0052. We are emailing the corresponding digital copies (as PDFs 1-72) of the same, hand-signed individual Public Scoping Comments OPPOSING HOLTEC'S PROPOSED CISF AND RELATED TRANSPORT OF HLRW.

Box 1 contains PDFs 1-20.  
Box 2 contains PDFs 21-41.  
Box 3 contains PDFs 42-72.

**This email corresponds to Box 1: PDF 3.**

Leona Morgan, Co-Coordinator  
Nuclear Issues Study Group  
[protectnewmexico@gmail.com](mailto:protectnewmexico@gmail.com)  
+1 505 879 8547

**Federal Register Notice:** 83FR13802  
**Comment Number:** 3217

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**Subject:** [External\_Sender] Docket ID NRC-2018-0052 \_ NISG \_ PDF 3 of 72  
**Sent Date:** 7/31/2018 1:51:27 AM  
**Received Date:** 7/31/2018 1:51:59 AM  
**From:** Protecting NM From All Things Nuclear

**Created By:** protectnewmexico@gmail.com

**Recipients:**

**Post Office:** gmail.com

Files	Size	Date & Time
MESSAGE	639	7/31/2018 1:51:59 AM
NRC-2018-0052_NISG-3.pdf	3864507	
ATT00001.htm	496	

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**Reply Requested:** No  
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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 Spent Fuel Waste Facility

Nuclear Regulatory Commission:

I am extremely concerned about the Consolidated Interim Storage (CIS) facility proposed by Holtec International to store up to 100,000 metric tons of high-level radioactive waste in southeast New Mexico. I respectfully submit the following comments regarding the proposal itself and the scope of the Environmental Review and analysis for the Environmental Impact Statement (EIS).

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**More Alternatives Must Be Analyzed**

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- The EIS must include all possible transportation routes and study the potential impacts from accidents, terrorism incidents, and how new rail lines or roads for waste shipments will impact public health, environment, water sources, flora, fauna (especially any endangered species), and occupational safety along these routes.

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Sincerely,

Signature



Date 6-23-2018

Name (Print)

Dennis Maie H

City & State

Albuquerque, New Mexico 87102



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

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Signature



Date

6-23-18

Name (Print)

Rose Sanchez

City & State

Albany NM 87102

May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
U.S. Nuclear Regulatory Commission  
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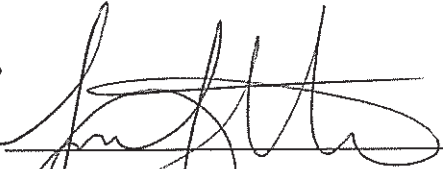
Sincerely,

Signature

Name (Print)

City & State

Date

  
Date 6/23/18  
Name (Print) Jennifer Hurtado  
City & State Mckinney, TX



May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
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Signature Bita E. Romero Date 6/23/18

Name (Print) Bita E. Romero

City & State Albuquerque, NM

May Ma  
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Signature  Date 6/22/18

Name (Print) Andy West

City & State Alb. N.H.

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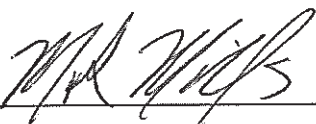
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Signature



Date

6-23-18

Name (Print)

MARK MILLS

City & State

ABQ NM

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

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Signature

*Catherine L. Hobbs*

Date

*June 23, '18*

Name (Print)

*Catherine L. Hobbs*

City & State

*ABQ, NM*

May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
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Signature



Date

6/23/18

Name (Print)

Jennifer Greb

City & State

Albuquerque, NM



May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
U.S. Nuclear Regulatory Commission  
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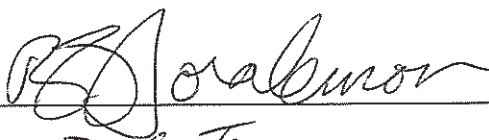
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Date

6/23/2018

Name (Print)

B.G. JORALEMON

City & State

Albuquerque NM

May Ma  
Office of Administration  
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Name (Print) Kenn S. Shock

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Name (Print)

Michelle Gonzales-Shiner

City & State

Albuquerque, NM

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Sincerely,

Signature

Name (Print)

City & State



Julie Pederson

ABQ NM

Date

6-23-18

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 Spent Fuel Waste Facility

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Signature



Date

6-23-18

Name (Print)

Kindra Hill

City & State

Albuquerque, NM

May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
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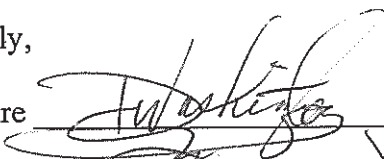
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Name (Print)

Dina Washington

City & State

Albuquerque, NM

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*There's no such thing as clean nuclear!*

Sincerely,

Signature

*Megan Wulffraat*

Date 23 JUNE 2018

Name (Print)

MEGAN WULFFRAAT

City & State

ALBUQUERQUE NM



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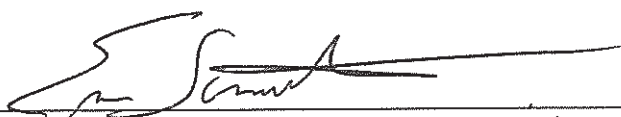
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Date

6/23/18

Name (Print)

ERIK S. ROSTK

City & State

Albuquerque, NM 87104

May Ma  
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Sincerely,

Signature

*Karen Lucero*

Date

*6/23/18*

Name (Print)

*Karen Lucero*

City & State

*Albuquerque, NM*

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 Spent Fuel Waste Facility

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Signature Adela Chavez Date 6-23-18

Name (Print) Adela Chavez

City & State Albuquerque NM



May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
U.S. Nuclear Regulatory Commission  
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Signature



Date

6/23/18

Name (Print)

Benjamin S. Wilson

City & State

ABQ, NM

May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
U.S. Nuclear Regulatory Commission  
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*J. Aragon*

Date

*6/23/18*

Name (Print)

*JOSEPH H. ARAGON*

City & State

*Belen, NM 87002*



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Mail Stop: TWFN-7- A60M  
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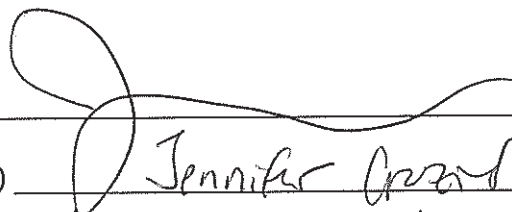
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Jennifer Crowl  
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6/23/18

May Ma  
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Name (Print)

rick gallagher

City & State

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Signature

Rebecca Gilson

Date

6/23/18

Name (Print)

Rebecca Gilson

City & State

Albuquerque NM 87111



May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
U.S. Nuclear Regulatory Commission  
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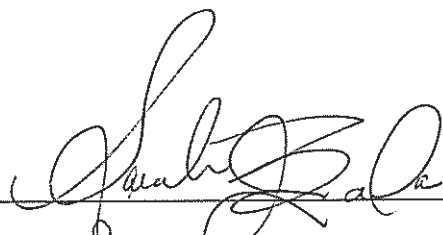
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Sincerely,

Signature



Date 6-23-18

Name (Print)

Sarah Barba

City & State

Santa Fe, NM

May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
U.S. Nuclear Regulatory Commission  
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Signature Anne M Downing Date 6/23/18

Name (Print) Anne M Downing

City & State ABQ, NM



May Ma  
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Signature Ry Grebe Date 06/27/18

Name (Print) Ryan Grebe

City & State Albuquerque, NM

May Ma  
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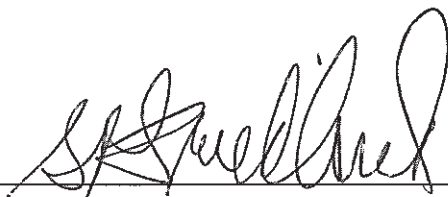
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Name (Print)

S. FRIEDLAND

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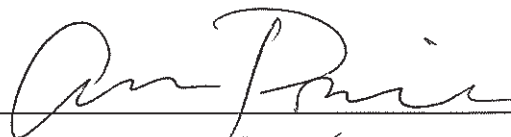
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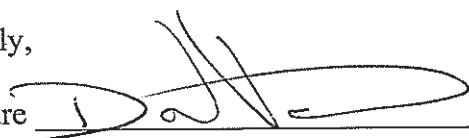
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Sincerely,

Signature



Date

01/23/18

Name (Print)

David Vazquez

City & State

Albuquerque N.M.



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 Spent Fuel Waste Facility

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Sincerely,

Signature



Date

6/23/2018

Name (Print)

Gerald Levesee

City & State

Albuquerque, NM

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

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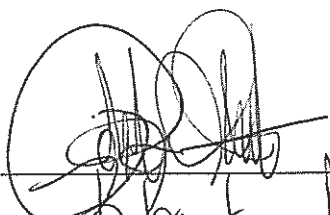
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Sincerely,

Signature

Name (Print)

City & State

  
Roberto A. Niato  
Albuquerque NM

Date

06/23/18



May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
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*No Waste Here*

Sincerely,

Signature

*Jude Avila*

Date

*8-26/19*

Name (Print) \_\_\_\_\_

City & State \_\_\_\_\_

May Ma  
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*MARGARET WEINROD*

City & State

*Los Angeles CA*



May Ma  
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Date

*2/23/16*

Name (Print)

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City & State

*Albuquerque, NM*

May Ma  
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Sincerely,

Signature

*Maria R. Kelly*

Date

*6/23/2018*

Name (Print)

*MARIA R KELLY*

City & State

*Albuquerque, New Mexico*



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 Spent Fuel Waste Facility

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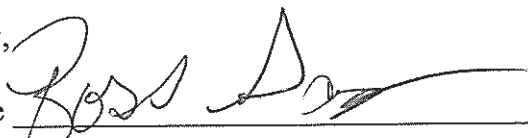
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Sincerely,

Signature



Date

6-23-18

Name (Print)

Ross Garcia

City & State

Albuquerque NM

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

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Signature



Date

6.23.18

Name (Print)

Adrian Acosta

City & State

Albuquerque, NM



May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
U.S. Nuclear Regulatory Commission  
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Virginia B. Hoak Date 6-23-18

Name (Print)

Virginia B. Hoak

City & State

Alb, NM

May Ma  
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Name (Print) Kristin Conant

City & State Natick, MA 01760



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Date

*6/23/18*

Name (Print)

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City & State

*Albuquerque NM*

May Ma  
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Signature

Vera M Burright

Date

6/23/18

Name (Print)

Vera M Burright

City & State

Albuquerque, NM



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 Spent Fuel Waste Facility

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Signature Debbie Alarcon Date 6-23-18

Name (Print) Debbie Alarcon

City & State Albuquerque N.M.

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

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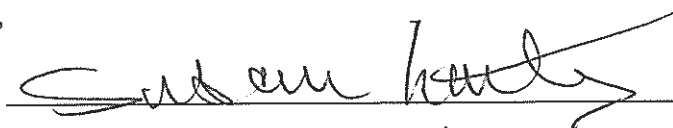
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Signature



Date

6-23-18

Name (Print)

Susan Lentz

City & State

Los Alamos NM



May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
U.S. Nuclear Regulatory Commission  
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Signature Lacey Chrisco Date 6/23/18

Name (Print) LACEY CHRISCO

City & State ALBUQUERQUE, NM

May Ma  
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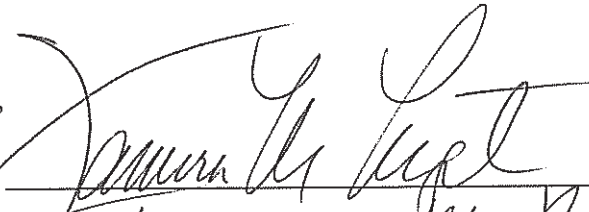
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Date

  
IANAKA M. NEGAT  
ALBUQUERQUE, NM 87105



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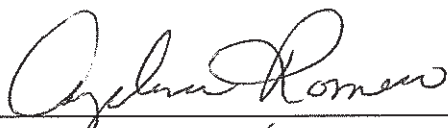
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Date

6/23/18

Name (Print)

Angelina Romero

City & State

Ally. N. Mex 87105

May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
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- NRC must require Holtec to produce an ER that has no such copyright restrictions and has no redactions. It is impossible to make recommendations on the scope of analyses of these redacted areas of the ER for the EIS.

**The Impacts Of Permanent Storage Must Be Analyzed**

- The ER is incomplete because it does not analyze the impacts of the spent fuel being left at the Holtec site indefinitely. The EIS needs to include an analysis of the impacts of permanent storage should the CIS facility become a de facto permanent waste site.

**More Alternatives Must Be Analyzed**

- The high-level radioactive waste is too dangerous to move and can remain on site for many more years. It should not be moved until all alternatives are analyzed, including keeping the waste where it is in some form of Hardened On Site Storage (HOSS) on the reactor sites or at suitable locations as close to the reactors as possible to minimize transport risks.
- The alternative of consolidated storage at an existing licensed Independent Spent Fuel Storage Facility (ISFSI) must also be analyzed.

**All Transportation Routes And Risks Must Be Analyzed**

- The EIS must include all possible transportation routes and study the potential impacts from accidents, terrorism incidents, and how new rail lines or roads for waste shipments will impact public health, environment, water sources, flora, fauna (especially any endangered species), and occupational safety along these routes.

### **The Consequences To An Accident-Exposed Individual Must Be Analyzed**

- Terms like "collective dose risk" and "person-rem" are used to ignore the potential impacts to a single individual.
- All possible human exposures from routine and accidental radioactive releases during transport and at the site must be clearly defined in plain language, for individuals near waste on occasion and workers who are transporting or working at the CIS site long-term.

### **Cracked And Leaking Canisters Must Be Addressed**

- The ER does not analyze exactly how radioactive waste from a cracked and leaking canister would be handled, since there is no wet pool or hot cell at the site. The EIS must include how cracked and leaking canisters will be handled onsite and during transport and analyze possible environmental impacts if leaks or spills occur from cracked canisters.

### **More Cumulative Impacts Must Be Analyzed**

- The ER mentions the Waste Isolation Pilot Plant (WIPP) but does not analyze the impacts of a radiologic release from WIPP on the proposed CIS site.
- The impacts from WIPP and possible impacts from and to the local oil and gas industries need to be analyzed and included in the EIS.

### **Seismic Impacts On Stored Casks Must Be Stated**

- Although the ER gives a statement on recent seismic activity in the area, there is no analysis of what fracking-induced earthquakes will have on the buried casks. These impacts need to be analyzed and included in the EIS.

### **Future Electrical Transmission Lines And Other Infrastructure Must Be Analyzed**

- Impacts from new electrical lines, surface and subsurface projects must be included in EIS.

### **Economic Impacts Must Be Analyzed For The Different Phases Of The Project**

- The economic impacts must be studied and clearly state any positive or negative impacts from this site: initially, after construction is complete, and throughout the whole 120 years.
- How many jobs will be created? How many are only temporary and how many are permanent? How many will go to local residents?

### **A Thorough Environmental Justice (EJ) Analysis Must Be Included In The EIS**

- Impacts to EJ communities near the site and along transport routes must be studied, including but not limited to economic and health impacts that are specific to lower income and people of color communities. For indigenous populations located near the site or along transport routes, this EJ analysis must include impacts to culturally important natural resources, such as: sacred places, traditional food sources, and traditional medical plants.

Sincerely,

Signature

*A. Britz*

Date

*6-23-18*

Name (Print)

*Alice Britz*

City & State

*ABQ, NM 87108*



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 Spent Fuel Waste Facility

Nuclear Regulatory Commission:

I am extremely concerned about the Consolidated Interim Storage (CIS) facility proposed by Holtec International to store up to 100,000 metric tons of high-level radioactive waste in southeast New Mexico. I respectfully submit the following comments regarding the proposal itself and the scope of the Environmental Review and analysis for the Environmental Impact Statement (EIS).

I am submitting these comments because I do not consent to New Mexico becoming a national dumping ground for "spent fuel" from every nuclear reactor in the country. I do not consent to transporting up to 10,000 canisters of highly radioactive waste through communities nationwide. I do not consent to the risk of contamination of our lands, aquifers, air, or the health of our people, plants, wildlife, and livestock. I do not consent to endangering present and future generations.

I formally request additional Public Scoping Meetings for other communities throughout the United States (U.S.) that will be impacted by the transport of these waste canisters.

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Sincerely,

Signature Kerri Wormwood Date 6/23/18

Name (Print) Kerri Wormwood

City & State Albuquerque NM 87110

