

## Holtec-CISFEISCEm Resource

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**From:** Protecting NM From All Things Nuclear <protectnewmexico@gmail.com>  
**Sent:** Tuesday, July 31, 2018 2:00 AM  
**To:** Holtec-CISFEIS Resource  
**Subject:** [External\_Sender] Docket ID NRC-2018-0052 \_ NISG \_ PDF 12 of 72  
**Attachments:** NRC-2018-0052\_NISG-12.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 12.**

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:** 3226

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**Subject:** [External\_Sender] Docket ID NRC-2018-0052 \_ NISG \_ PDF 12 of 72  
**Sent Date:** 7/31/2018 1:59:35 AM  
**Received Date:** 7/31/2018 2:00:13 AM  
**From:** Protecting NM From All Things Nuclear

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

**Recipients:**

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Files	Size	Date & Time
MESSAGE	634	7/31/2018 2:00:13 AM
NRC-2018-0052_NISG-12.pdf	3917374	
ATT00001.htm	1034	

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**Priority:** Standard  
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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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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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#### **More Alternatives Must Be Analyzed**

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- 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.
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- How many jobs will be created? How many are only temporary and how many are permanent? How many will go to local residents?

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- 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

Date

Name (Print)

City & State



07/14/18

CAROLENE WHITMAN

GALLUP NM



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

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Sincerely,

Signature

Melvin Thompson, Sr.

Date

July 14, 17

Name (Print)

Melvin Thompson, Sr.

City & State

Coyote Canyon, NM

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

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Sincerely,

Signature



Date

7-16-18

Name (Print)

Roxanne Thompson

City & State

Coyote Canyon, New Mexico



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

Signature



Date 7-14-18

Name (Print)

Amanda M. Patel

City & State

Sandia Park, NM

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

LISA TARALA

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Sincerely,

Signature



Date

7/14/18

Name (Print)

KATHY BRECHER

City & State

Santa Fe, 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

Anvrai Pearson

Date 07/14/2018

Name (Print)

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City & State

Santa Fe, New Mexico



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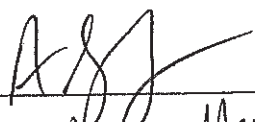
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Date

7/14/18

Name (Print)

Alex Meyer

City & State

San Diego, CA

May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
U.S. Nuclear Regulatory Commission  
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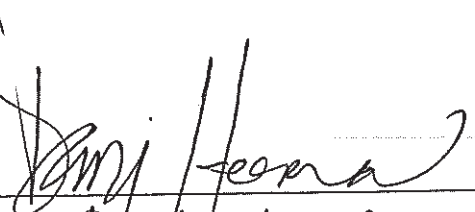
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Name (Print)

City & State



DANI HERRERA

SANTA FE, NEW MEXICO

Date

July 14, 2018



May Ma  
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*E. Conner*

Date

*7/17/18*

Name (Print)

*EVILIN CORDERO*

City & State

*San Diego, CA*

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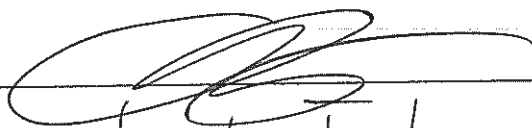
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Date

7/14/18

Name (Print)

Charles Tunley

City & State

SF NM

87601



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Sincerely,

Signature

Name (Print)

City & State

Ed Cislén

Ed Cislén

Ed Cislén

AUSTIN, TX 78739

Date

7-14-18

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

DAY GRIFFIN JR.

Date

7/14/18

Name (Print)

DAY GRIFFIN JR.

City & State

CHARLOTTE, NC



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

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Sincerely,

Signature

Danna Brackenbury

Date

7/14/2018

Name (Print)

Danna Brackenbury

City & State

Santa Fe, 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

Name (Print)

City & State

*Chuck Nelson*  
*7/14/18*  
*Chuck Nelson*  
*Mill Valley, CA*



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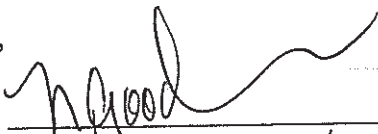
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Date

7/14/18

Name (Print)

NATALIE M. HARBECK-GOODWIN

City & State

LAS CRUCES, NM

May Ma  
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Name (Print) Lori Lili

City & State Rio Rancho NM



May Ma  
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Name (Print) Dreama Leone  
City & State Wilmington, Delaware

May Ma  
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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

*Paul Goodman*

Date

*7/14/18*

Name (Print)

*PAUL GOODMAN*

City & State

*Las Cruces, NM*



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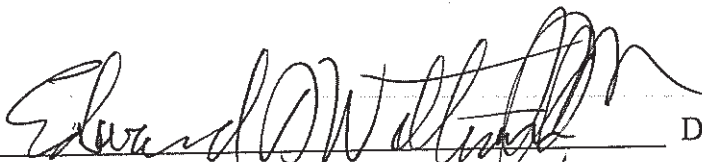
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Sincerely,

Signature



Date

7/14/18

Name (Print)

Edward D Williams

City & State

Genta FC NM 87509

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



Date 07/14/2018

Name (Print)

KEN BAUMANN

City & State

SANTA FE, NM



May Ma  
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Signature Judy Dunham Date 7-14-18  
Name (Print) Judy Dunham  
City & State Scottsdale AZ

May Ma  
Office of Administration  
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Date

*7/14/18*

Name (Print)

*Sarah Samarchi*

City & State

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Date

*July 17, 2018*

Name (Print)

*ELIZABETH HAY*

City & State

*PORTLAND, OR*

May Ma  
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Sincerely,

Signature



Date

7.14.18

Name (Print)

MARK E. MASCARENAS

City & State

LITTLETON CO



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

*Leslie Mascarenas*

Date

7/14/18

Name (Print)

Leslie Mascarenas

City & State

Littleton CO

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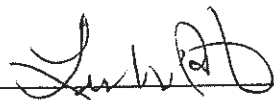
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Signature



Date

7/14/18

Name (Print)

Leslie M Porter

City & State

Scandia Park, NM



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

Date

*14 July 2018*

Name (Print)

*Suzie Beg*

City & State

*Abq NM*

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

Jeffrey Beg

City & State

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Willie Nehls

Date

7/14/18

Name (Print)

Willie Nehls

City & State

Santa Fe NM

May Ma  
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Sincerely,

Signature



Date

8/29/18

Name (Print)

Jasmine May Crosby

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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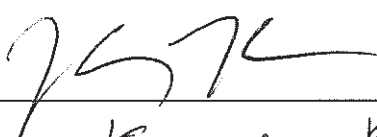
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Signature



Date

6/28/18

Name (Print)

Keegan Kloe

City & State

Albuquerque, NM

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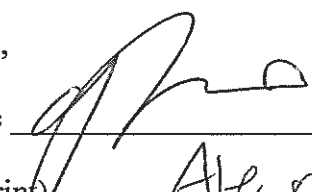
Sincerely,

Signature

Name (Print)

City & State

Date

  
Alejandro Padilla  
Albuquerque NM  
6/28/2018



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

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Signature

Adam Smith Date 6/28/18

Name (Print)

Adam Smith

City & State

Albuquerque, New Mexico

May Ma  
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Name (Print)

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City & State

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Name (Print)

Henry Hutchinson

City & State

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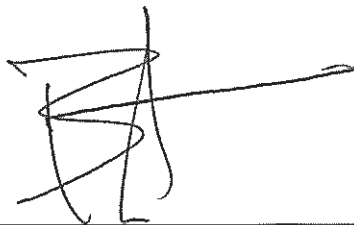
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Sincerely,

Signature



Date

6/29/18

Name (Print)

Ben Levine

City & State

Albuquerque NM 87105



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

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Date

6-28-18

Name (Print)

VANKON MENDOZA

City & State

ABQ, NM 87105

May Ma  
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Signature Jay Letcher Date 6/28/18

Name (Print) Lazarus Letcher

City & State Albuquerque, NM



May Ma  
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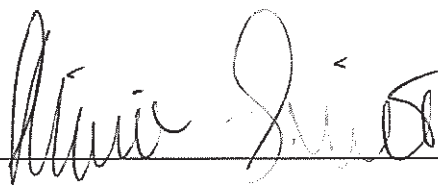
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Date

06/28/18

Name (Print)

Apicia Siravo

City & State

Rhode Island

May Ma  
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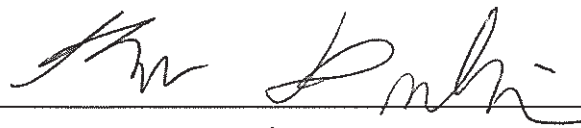
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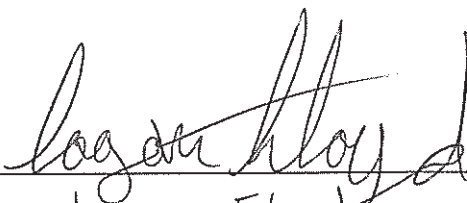
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Sincerely,

Signature



Date

6/28/18

Name (Print)

Robert Stevens

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

6/22/18

Name (Print)

Adriana De la Cruz

City & State

ABQ New Mexico

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 6-29-18

Name (Print)

Rachel Goldman

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 6-29-18

Name (Print) Ronnie Tallman

City & State Tuba City, Arizona

May Ma  
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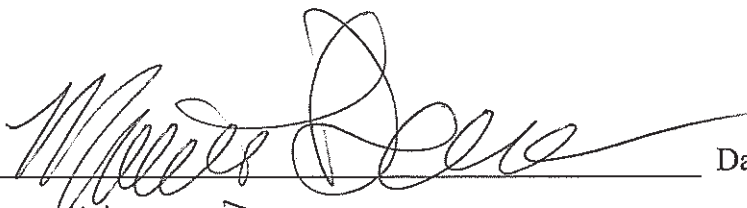
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Date

Jun - 30 - 18

Name (Print)

MONICA DEMARCO

City & State

Albq. NM



May Ma  
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Date

6/27/18

Name (Print)

Jessica Markovitz

City & State

Santa Fe New Mexico

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

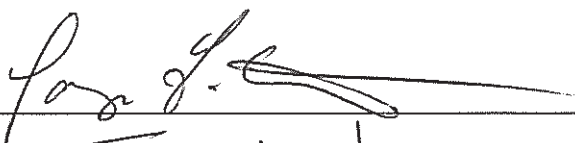
- The economic impacts must be studied and clearly state any positive or negative impacts from this site: initially, after construction is complete, and throughout the whole 120 years.
- How many jobs will be created? How many are only temporary and how many are permanent? How many will go to local residents?

**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



Date

6-28-18

Name (Print)

Tanya F. Nuñez

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

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.

#### **This Holtec Proposal Is Contrary To Current Law**

- Current law only allows the U.S. Department of Energy to take title to commercial spent fuel "following commencement of operation of a repository" or at a DOE-owned and operated monitored retrievable storage facility. The Holtec site meets neither requirement, as it is a private facility.

#### **Holtec Must Remove Copyrights And All Redactions In The Environmental Report (ER)**

- 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**

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Sincerely,

Signature  Date 6/28/18  
Name (Print) Jacqueline Chacón  
City & State Albuquerque, NM

