

## Holtec-CISFEISCEm Resource

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**From:** Protecting NM From All Things Nuclear <protectnewmexico@gmail.com>  
**Sent:** Tuesday, July 31, 2018 2:21 AM  
**To:** Holtec-CISFEIS Resource  
**Subject:** [External\_Sender] Docket ID NRC-2018-0052 \_ NISG \_ PDF 35 of 72  
**Attachments:** NRC-2018-0052\_NISG-35.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 2: PDF 35.**

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:** 3251

**Mail Envelope Properties** (3BCAEBEB-7705-4B44-9B4F-465965F16742)

**Subject:** [External\_Sender] Docket ID NRC-2018-0052 \_ NISG \_ PDF 35 of 72  
**Sent Date:** 7/31/2018 2:21:16 AM  
**Received Date:** 7/31/2018 2:21:42 AM  
**From:** Protecting NM From All Things Nuclear

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

**Recipients:**

**Post Office:** gmail.com

Files	Size	Date & Time
MESSAGE	634	7/31/2018 2:21:42 AM
NRC-2018-0052_NISG-35.pdf	2796566	
ATT00001.htm	496	

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

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:

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**More Alternatives Must Be Analyzed**

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**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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Sincerely,

Signature



Date

7-20-18

Name (Print)

Lee Webster

City & State

Santa Fe NM 87501

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

20 July 2018

Name (Print)

David Greenfeldt

City & State

Santa Fe, NM 87505



May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
U.S. Nuclear Regulatory Commission  
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Signature Mary Ann Maestas Date 7-20-18

Name (Print) Mary Ann Maestas

City & State Santa Fe, N.M. 87507



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Office of Administration  
Mail Stop: TWFN-7- A60M  
U.S. Nuclear Regulatory Commission  
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Signature  Date 7/18/18

Name (Print) Brianne Arviso

City & State Gallup, NM

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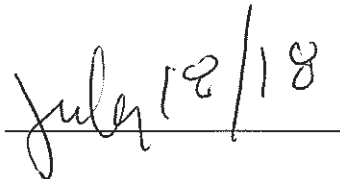
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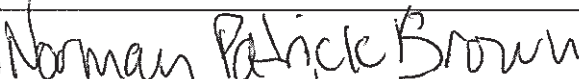
Signature



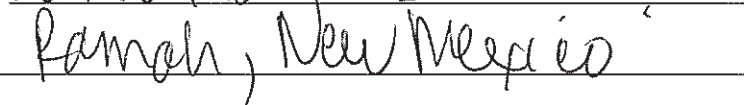
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Sincerely,

Signature

*Angela Gabriel*

Date

*7/20/2018*

Name (Print)

*Angela Gabriel*

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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Sincerely,

Signature Chaia Ross Date July 20, 2018  
Name (Print) Chaia Ross  
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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Sincerely,

Signature Wynona R. Foster Date 07-18-18

Name (Print) Wynona R. Foster

City & State Lake Valley, 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 Maj-Brill Eagle Date July 19, 2015

Name (Print) M. Eagle

City & State Santa Fe, N.M. 87505



May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
U.S. Nuclear Regulatory Commission  
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Signature  Date 7-20-18

Name (Print) EDA GORDON

City & State Potsdam, NY

May Ma  
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Mail Stop: TWFN-7- A60M  
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Signature Alicia Da Silva Date 07/20/18  
Name (Print) Alicia Renountre - Da Silva  
City & State Santa Fe, NM 87501

May Ma  
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Signature Vernandria Livingston Date 7/18/18

Name (Print) Vernandria Livingston

City & State Gallup, 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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Signature Kyleigh Brown Date July 18, 2018  
Name (Print) Kyleigh Brown  
City & State Grants, New Mexico

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

Signature Nicole Walker Date 7-18-18

Name (Print) Nicole Walker

City & State Gallup N.M. 87301

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

*Julia H. Johnson*

Date

*July 18, 18*

Name (Print)

*Julia H. Johnson, Bx 6284*

City & State

*Gallup NM 87305*



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



Date

7/18/18

Name (Print)

Shashy Tsosie

City & State

Gallup New Mexico

May Ma  
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Signature Dia Winograd Date 7/20/18  
Name (Print) Dia Winograd  
City & State Santa Fe, NM 87508

May Ma  
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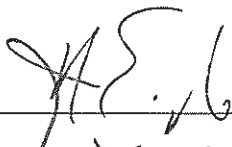
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Date

20 July 2018

Name (Print)

JAMES EAGLE

City & State

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Sincerely,

Signature

Cayanne Robinson

Date

7/20/18

Name (Print)

Cayanne Robinson

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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Sincerely,

Signature Kenneth Brown Date 7-18-18

Name (Print) KENNETH BROWN

City & State Gallup N.M. 87301



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

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Signature

*Dwayne D. Norris*

Date

7/21/18

Name (Print)

Dwayne D. Norris

City & State

ABQ, NM 87112

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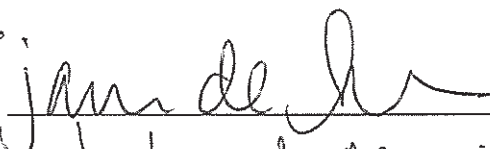
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Date

5/25/18

Name (Print)

Jaelyn de Maria

City & State

Albuquerque, NM



May Ma  
Office of Administration  
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Name (Print)

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City & State

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Name (Print) William Jackson

City & State Alamosa NM

May Ma  
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Mail Stop: TWFN-7- A60M  
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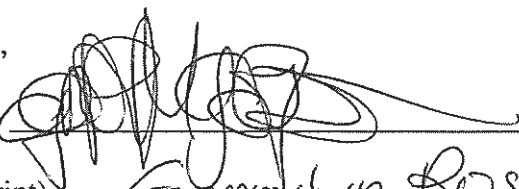
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Sincerely,

Signature



Date

5/27

Name (Print)

Gennylyn Rose Gaspar

City & State

Taos, 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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- 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.

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- 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.

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Sincerely,

Signature

Lynda Malyneaux Date 5/29/18

Name (Print)

Lynda Malyneaux

City & State

Tyrone NM 87059

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 respectfully submit these scoping comments on the Holtec Environmental Report (ER) to bring up to 100,000 metric tons of spent fuel, high-level radioactive waste, from nuclear reactors around the country to southeast New Mexico. I am submitting the following comments because I do not consent to New Mexico becoming a national radioactive waste dumping ground. I do not consent to transporting up to 10,000 canisters of highly radioactive waste through thousands of communities nationwide. I do not consent to the risk of contamination of our lands, aquifers, air, or the health of plants, wildlife, and livestock. I do not consent to endangering present and future generations.

I formally request a 60-day Extension Of Time For This Comment Period. A 60-day comment period places an undue burden on the public to respond to this 543-page technical document. I formally request additional Public Scoping Meetings for other communities in New Mexico and nationwide that will be impacted by the transport and that any additional meetings have time for the public to make verbal comments to those present.

A thorough Environmental Justice analysis must be complete to consider all possible future impacts from this facility to the local communities and those along transport routes, including but not limited to: economic and health impacts. I also request proper Tribal Consultation for any affected indigenous nations whose people, cultural resources, or sacred places may adversely impacted at the site and along transportation routes.

#### **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**

- NRC must require Holtec to produce an ER that has no such copyright restriction and has no redactions.

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

- The Environmental Report (ER) is inadequate and incomplete because it does not analyze the impacts of the spent fuel being left at the Holtec site indefinitely.

#### **More Alternatives Must Be Analyzed**

- Keeping the spent fuel casks in some form of Hardened On Site Storage (HOSS) on the reactor sites must be analyzed.
- The alternative of consolidated storage being done at an existing licensed Independent Spent Fuel Storage Facility (ISFSI) must be analyzed.
- The waste can and should remain on site for many more years and does not need to move until thorough analyses of alternatives are complete.

**The Environmental Report inadequately discusses the transportation Risks**

- This ER must include all transportation routes and the potential impacts of accidents or terrorism incidents on public health and safety along all the routes.
- The ER is incomplete because it does not discuss how rail shipments from reactors without rail access would be accomplished and the risks and impacts of such shipments.

**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 exposures to humans from routine releases from transport casks and site storage must be clearly defined in plain language, for individuals near waste canisters on occasion and workers who are transporting or working at the 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.

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- 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 the local oil and gas industry on the proposed site need to be analyzed.

**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 many 3.0-4.0 fracking-induced earthquakes will have on the buried casks.

**Impacts Of Future Railroads And Electric Lines Must Be Analyzed**

- The railroads and electric lines are not in place, but must be analyzed.

**How many of the estimated 135 jobs will go to locals and how many are only temporary?**

- The total number of annual workers at the site could total as many as 135 when short-term, construction jobs are combined with the operating workforce. How many of these jobs will create long-term careers for local communities? How many jobs and careers will benefit local residents?

Sincerely,

Signature  Date 5/23/18

Name (Print) David Drezner

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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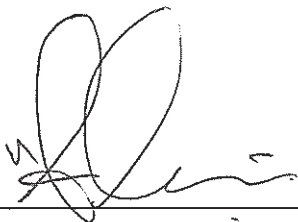
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Sincerely,

Signature



Date

May 24, 2018

Name (Print)

AC NAIR Ltr 2A

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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Sincerely,

Signature Don Hyde Date 7-6-18

Name (Print) Don Hyde

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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Sincerely,

Signature

Name (Print)

City & State

 Date 7-7-2018  
ISABELLE HESSLER  
Albuquerque NM 87107



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

*Christine Rossi*

Date

*7/5/18*

Name (Print)

*Christine Rossi*

City & State

*ABQ 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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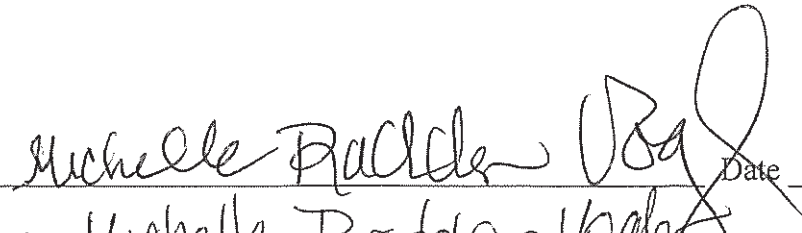
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Signature

Name (Print)

City & State

  
Date 7/5/18  
Michelle Backen Vogle  
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

*Loren Kahn*

Date

*7/5/18*

Name (Print)

*LOREN KAHN*

City & State

*ABQ, NM*

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Office of Administration  
Mail Stop: TWFN-7- A60M  
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Date

*07/08/18*

Name (Print)

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City & State

*Gallup, NM 87301*

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Date

7/8/18

Name (Print)

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City & State

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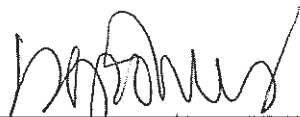
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7-10-2018

Name (Print)

Barbara Grothus

City & State

Albuquerque NM 87102

May Ma  
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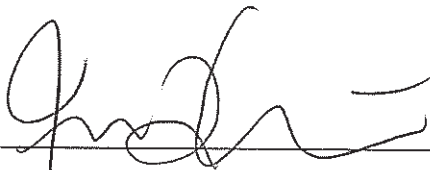
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Sincerely,

Signature



Date

July 9, 2018

Name (Print)

Frances L. Chaves

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:

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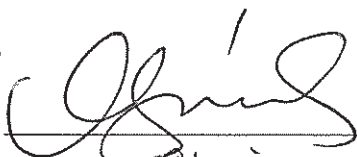
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Signature



Date

7/10/18

Name (Print)

Christina Gonzalez

City & State

ABQ

NM

May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
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Signature Richard L. Harrison Date 7-11-18

Name (Print) Richard L. Harrison

City & State Albuquerque, N.M.

May Ma  
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Mail Stop: TWFN-7- A60M  
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Name (Print) Anna M. Harrison

City & State Albuquerque NM 87109



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City & State

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