

## Holtec-CISFEISCEm Resource

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**From:** Protecting NM From All Things Nuclear <protectnewmexico@gmail.com>  
**Sent:** Tuesday, July 31, 2018 2:25 AM  
**To:** Holtec-CISFEIS Resource  
**Subject:** [External\_Sender] Docket ID NRC-2018-0052 \_ NISG \_ PDF 45 of 72  
**Attachments:** NRC-2018-0052\_NISG-45.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 3: PDF 45.**

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:** 3262

**Mail Envelope Properties** (A84E8250-8721-418C-9576-0FD22A02EFCA)

**Subject:** [External\_Sender] Docket ID NRC-2018-0052 \_ NISG \_ PDF 45 of 72  
**Sent Date:** 7/31/2018 2:24:47 AM  
**Received Date:** 7/31/2018 2:26:06 AM  
**From:** Protecting NM From All Things Nuclear

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

**Recipients:**

**Post Office:** gmail.com

Files	Size	Date & Time
MESSAGE	630	7/31/2018 2:26:06 AM
NRC-2018-0052_NISG-45.pdf		3194073
ATT00001.htm	803	

**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:

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.

**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 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 Sharon Thomas Date 5-22-2018

Name (Print) Sharon Thomas

City & State Los Lunas, NM 87031



May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
U.S. Nuclear Regulatory Commission  
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RE: Docket ID NRC-2018-0052; Holtec International's HI-STORE Spent Fuel Waste Facility

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

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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.

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**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

*DB Gaudet*

Date

*5/22/18*

Name (Print)

*Deborah Gaudet*

City & State

*Albuquerque NM*

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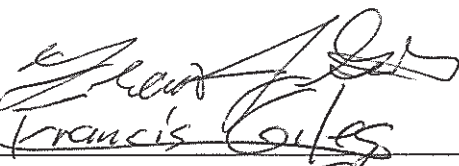
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Sincerely,

Signature

Name (Print)

City & State

  
Francis Coles

Francis Coles

Lincoln NE

Date

5-22-18



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

Signature Cynthia Florence Date 5/22/18  
Name (Print) Cynthia Florence  
City & State Abq., NM

May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
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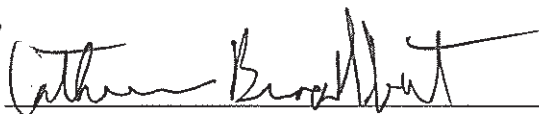
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5/22/18

Name (Print)

Catherine Broadbent

City & State

Santa Fe, NM



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- 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?

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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 Barbara King Date 5/22/18  
Name (Print) Barbara King  
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.

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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.
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Signature

*Rose Bell*

Date 5-21-2018

Name (Print)

*Rose Bell*

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

Name (Print)

City & State



Date

5/21/18

THOMPSON BELL

GALLUP N.M. 87305

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

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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.

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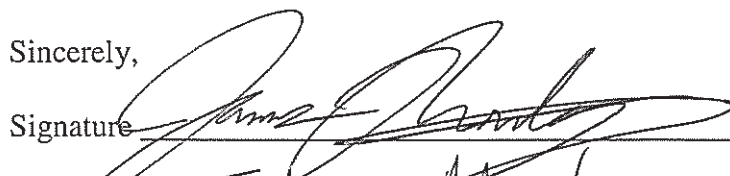
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Signature



Date

5/14/18

Name (Print)

James Montoya

City & State

Albuquerque NM



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

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Name (Print)

Miguel A Santistevan

City & State

Taos NM 87571

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Office of Administration  
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Signature Beata Tsosie-Peña Date 5-14-18

Name (Print) Beata Tsosie-Peña

City & State Española, NM. 87532

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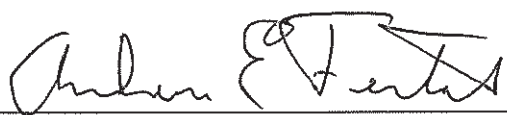
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Signature  Date 5-17-2018

Name (Print) ANDY FERTAL

City & State SANTA FE, NM

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- 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.

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- 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**

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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.

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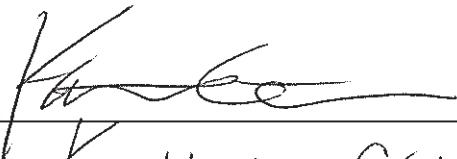
- The railroads and electric lines are not in place, but must be analyzed.

**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

5/14/18

Name (Print)

Katherine Cordova

City & State

Alb 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 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**

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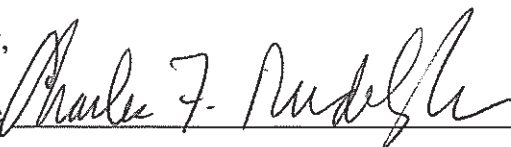
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- The total number of annual workers at the site could total as many as 135 when short-term, construction jobs are combined with the operating workforce. How many of these jobs will create long-term careers for local communities? How many jobs and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

Sincerely,

Signature



Date \_\_\_\_\_

Name (Print)

CHARLES F. RUDOLPH

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**

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#### **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**

- 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 Plumbing Infrastructure Must Be Analyzed**

- Impacts from new electrical lines and plumbing 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

Sally-Alice Thompson

Date 5/14/18

Name (Print)

Sally-Alice Thompson

City & State

ABQ NM

May 20, 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

NRC:

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 support making New Mexico a national radioactive waste dumping ground. I do not consent to transporting up to 10,000 canisters of high-level radioactive waste through thousands of communities across the United States. I do not consent to the nationwide transportation risks of contamination of 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 undo burden on the public to respond to this 543-page technical document.

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

**How many of the estimated 135 jobs will go to locals?**

- The total number of annual workers at the site could total as many as 135 when construction jobs are combined with the operating workforce.

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- 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.

[Enter your own comments here.]

Sincerely,

Signed 

Name (Print) Kemper Barkhurst

City & State Paralta, NM

May 20, 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

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[Enter your own comments here.]

Sincerely,

Signed Charabell Romero

Name (Print) Charabell Romero

City & State Albuquerque NM



May 20, 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

NRC:

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[Enter your own comments here.]

Sincerely,

Signed Elsis Lopez

Name (Print) ISIS LOPEZ

City & State ALBUQUERQUE, NM

May 20, 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

NRC:

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 support making New Mexico a national radioactive waste dumping ground. I do not consent to transporting up to 10,000 canisters of high-level radioactive waste through thousands of communities across the United States. I do not consent to the nationwide transportation risks of contamination of lands, aquifers, air, or the health of plants, wildlife, and livestock. I do not consent to endangering present and future generations.

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[Enter your own comments here.]

Sincerely,

Signed 

Name (Print) Luis Carlos Muñoz

City & State Alb. NM

May 20, 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

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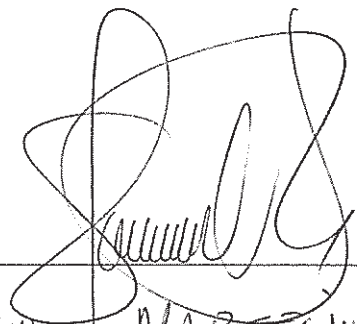
[Enter your own comments here.]

Sincerely,

Signed \_\_\_\_\_

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

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

  
MARCELINO PERALTA  
ALBUQUERQUE NM.

May 20, 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

NRC:

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 support making New Mexico a national radioactive waste dumping ground. I do not consent to transporting up to 10,000 canisters of high-level radioactive waste through thousands of communities across the United States. I do not consent to the nationwide transportation risks of contamination of 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 undo burden on the public to respond to this 543-page technical document.

**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.

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

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**More Alternatives Must Be Analyzed**

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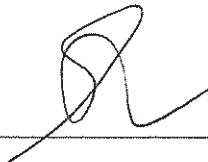
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[Enter your own comments here.]

Sincerely,

Signed



Name (Print)

Carrie Ryan

City & State

ABQ NM

87107

May 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

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[Enter your own comments here.]

Sincerely,

Signed



Name (Print)

Carrie Miller

City & State

Albuquerque, NM



May 20, 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

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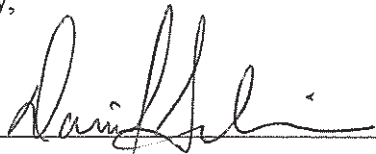
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[Enter your own comments here.]

Sincerely,

Signed 

Name (Print) DANIEL SCHAIRER

City & State Albuquerque NM

May 20, 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

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[Enter your own comments here.]

Sincerely,

Signed

Name (Print) MICHAEL O. WIECLAW

City & State ABQ, NM

May  
~~April~~ 19, 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

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Sincerely,

Signed Donald G. Leslie

Name (Print) Donald G. Leslie

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.

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**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.

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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.

**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

May 19, 2018

Name (Print)

Michele J. Yazzie

City & State

Gallup, 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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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.

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- 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.

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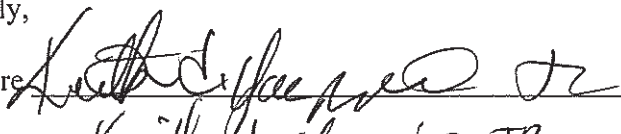
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**How many of the estimated 135 jobs will go to locals and how many are only temporary?**

- 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

May 19th 2018

Name (Print)

Keith D. Garrison Jr.

City & State

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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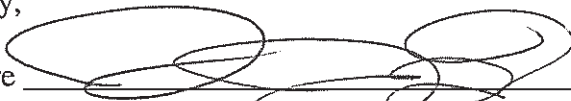
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Sincerely,

Signature



Date

5/19/2018

Name (Print)

JDE AJDUKOVICH

City & State

SAN DIEGO, CA

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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Signature Dolores Dinayazhe Date 5-19-18

Name (Print) Dolores Dinayazhe

City & State Flagstaff, AZ



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

05/19/18

Name (Print)

Carlos D Clark

City & State

Tempe AZ

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.
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**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

Veronica Laughter

Date

5/15/18

Name (Print)

Veronica Laughter

City & State

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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Signature



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Name (Print)

Berchina Davis

City & State

Gallup NM 87301



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Office of Administration  
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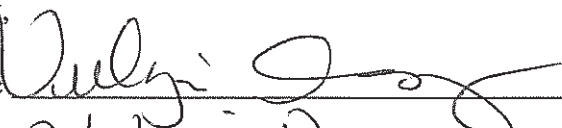
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Date

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Name (Print)

Vortynia Dempsey

City & State

Lukachukai AZ

May Ma  
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Sincerely,

Signature

Date

Name (Print)

City & State



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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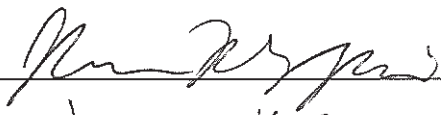
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Signature  Date 5-19-18  
Name (Print) John K Zarzic  
City & State Gallup NM

May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
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Signature Carly Calvez Date 5/17/18

Name (Print) Carly Calvez

City & State Zuni NM 87327

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Office of Administration  
Mail Stop: TWFN-7- A60M  
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Signature Debbie Nelson Date 5/19/18

Name (Print) Debbie Nelson

City & State Gallup, NM



May Ma  
Office of Administration  
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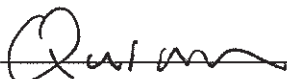
Signature



Date

May 19 2015

Name (Print)



City & State

Kanab UT

May Ma  
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Name (Print) Alvin J. Murphy

City & State Sanders, AZ



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Name (Print) Andrew Bitsoie

City & State Leupp AZ 86035

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Sincerely,

Signature  Date 5/19/18

Name (Print) Alexander James

City & State Carlsbad 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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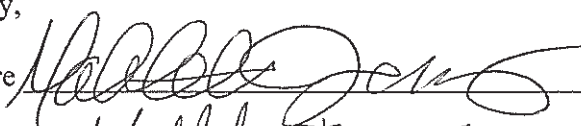
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Name (Print) Matthew James  
City & State Grants, New Mexico



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Signature

Kala Q Silversmith Date May 19, 2018

Name (Print)

Kala Silversmith

City & State

Whelan Rock, AZ

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

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Signature Raymond Emerson Date 5.19.18

Name (Print) RAYMOND EMERSON

City & State THOREAU, N.M 87323



May Ma  
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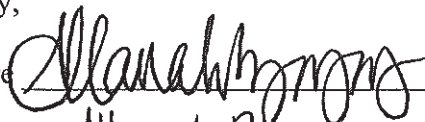
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Name (Print)

Alanah Begay

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*Reanna Dixon*

Date

*5/19/18*

Name (Print)

*REANNA DIXON*

City & State

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May Ma  
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Sincerely,

Signature Latanya Bowie Date 05-19-18

Name (Print) Latanya Bowie

City & State Gallup 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

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.

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- 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.

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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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Signature Ty Seam Bowie Date 5/19/2018

Name (Print) Ty Seam Bowie

City & State Bio Ranch NM

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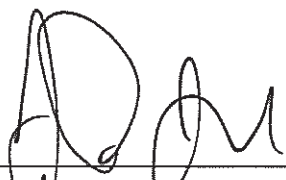
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Signature

Name (Print)

City & State



Lorenza Smith

Albuquerque, NM

Date

5-19-18



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

Date

*5/19/18*

Name (Print)

*Joelyn Siutza*

City & State

*Zuni, NM*

