

## Holtec-CISFEISCEm Resource

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**From:** Protecting NM From All Things Nuclear <protectnewmexico@gmail.com>  
**Sent:** Tuesday, July 31, 2018 2:55 AM  
**To:** Holtec-CISFEIS Resource  
**Subject:** [External\_Sender] Docket ID NRC-2018-0052 \_ NISG \_ PDF 58 of 72  
**Attachments:** NRC-2018-0052\_NISG-58.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 58.**

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:** 3276

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**Sent Date:** 7/31/2018 2:55:01 AM  
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**From:** Protecting NM From All Things Nuclear

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

**Recipients:**

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MESSAGE	634	7/31/2018 2:55:37 AM
NRC-2018-0052_NISG-58.pdf		4080662
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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:

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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.

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Sincerely,

Signature

*G. Michael Hawkins*

Date

*1/12/18*

Name (Print)

*G. Michael Hawkins*

City & State

*Alto, NM*

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

Signature Dale Hawkins Date 7-7-18

Name (Print) Dale Hawkins

City & State Alto NM

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



Date

7/7/18

Name (Print)

Avram R. Katz

City & State

Llano, NM

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

Signature

*Kristen Davenport*

Date

*July 7, 2018*

Name (Print)

*Kristen Davenport*

City & State

*Llano, NM 87543*

May Ma  
Office of Administration  
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City & State

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Sincerely,

Signature

Date

7/7/18

Name (Print)

Annabella Farmer

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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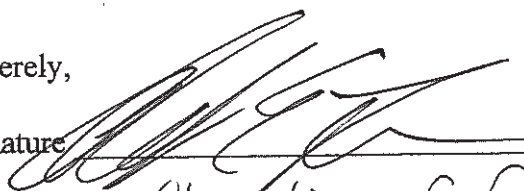
Sincerely,

Signature

Name (Print)

City & State

Date

  
Date 7/8/18  
Name (Print) Christina F Farmer  
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 Anna Mullen Date 07/07/18

Name (Print) Anna Mullen

City & State Dix Munes, IA

May Ma  
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Mail Stop: TWFN-7- A60M  
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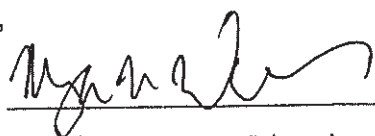
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Signature



Date

7/7/18

Name (Print)

Megan N Worthman

City & State

Denver, CO

May Ma  
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Michele Fitzsimmons

Date

July 8, 2018

Name (Print)

Michele Fitzsimmons

City & State

Orange CA

May Ma  
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Name (Print) THERESA WILLEMS

City & State 1000 Midland St.  
LITTLE ROCK, AR 72205

May Ma  
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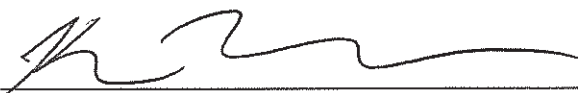
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Sincerely,

Signature



Date

4/10/18

Name (Print)

KENNETH TAYLOR

City & State

AUSTIN, TX 78704

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

*Alyce Croft*

Date

*07/10/18*

Name (Print)

*Alyce Croft*

City & State

*Austin, TX*

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



Date

7/10/18

Name (Print)

George Walters

City & State

Escondido New Mexico

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



Date

7-16-18

Name (Print)

Thomas Spencer

City & State

San 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 Pat Simmons Date 6/10/18

Name (Print) PAT SIMMONS

City & State ST LOUIS MO

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

City & State

Federico Pedraza Date July 10 2019  
Federico Pedraza  
Smart San Juan

May Ma  
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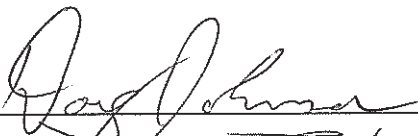
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Sincerely,

Signature



Date

7/10/18

Name (Print)

Doug Johnson

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



Date

7/10/18

Name (Print)

PETER BAKER

City & State

SHERMAN, N.Y.

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

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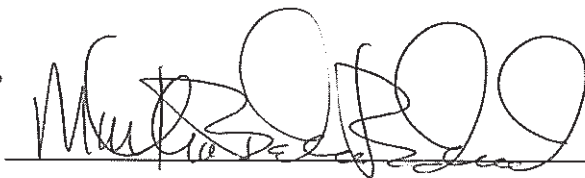
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Signature



Date

7/16/18

Name (Print)

Martha Baker Richardson

City & State

Santa Fe, NM

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

*Chris Wells*

Date

*6.11.18*

Name (Print)

*CHRIS WELLS*

City & State

*SF NM*

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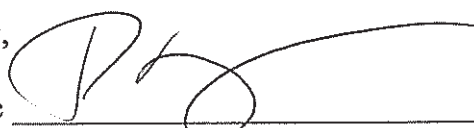
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Date

2/10/18

Name (Print)

Patricia Drown

City & State

Santa Fe, NM

May Ma  
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Name (Print)

City & State

7-10-18

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Denver CO 80237

May Ma  
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City & State

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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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Sincerely,

Signature

*William E. Evdokimoff*

Date

7/10/18

Name (Print)

WILLIAM EVDOKIMOFF

City & State

THE VILLAGES, FL

May Ma  
Office of Administration  
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Signature

Name (Print)

City & State

Jeanette Hoomar Date 07/10/18  
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The Villages, FL

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Signature

*Beverly Gina Leeds*

Date

*July 19, 2018*

Name (Print)

*Beverly Gina Leeds*

City & State

*Santa Fe, NM*

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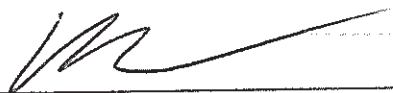
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Signature



Date

07/21/2018

Name (Print)

KEN BAUMANN

City & State

SANTA FE, NM

May Ma  
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City & State

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*Santa Fe NM*

*7/21/2018*

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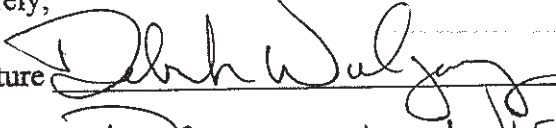
Sincerely,

Signature

Name (Print)

City & State

Date

  
7/27/18  
DEBORAH WIELGUSZ  
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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Sincerely,

Signature  Date 7/27/18

Name (Print) Donald C. Dionne

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 Tom Roberts Date 7/27/18

Name (Print) TOM ROBERTS

City & State Santa Fe, NM

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City & State

*Nina Rabstodt*

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072818

Name (Print)

Isaiel E. Gonzalez-Lakarduen

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Date

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Name (Print)

ELEANOR MILROY

City & State

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Signature



Date

7/27/18

Name (Print)

Neal Denton

City & State

Pecos, NM

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

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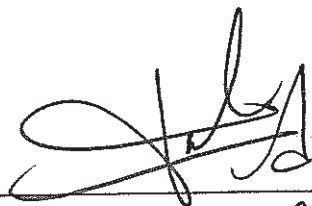
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Date

7/27/18

Name (Print)

Fabian Reza

City & State

Santa Fe, NM

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

7/27/18

Name (Print)

Annica Graham

City & State

Santa Fe, NM

May Ma  
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Signature

Date

Name (Print)

City & State

  
7/27/18  
Renee Denton  
Pecos, NM

May Ma  
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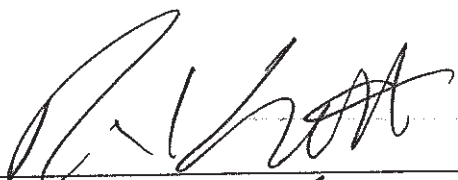
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Santa Fe NM

Date

27th July

May Ma  
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Name (Print) Glenn Mondrago  
City & State Santa Fe NMex 87508

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Signature

Alanna Sindlinger

Date

7/27/18

Name (Print)

Alanna Sindlinger

City & State

Santa Fe, NM

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

7-27-18

Name (Print)

Cory Sindlinger

City & State

Santa Fe, NM

May Ma  
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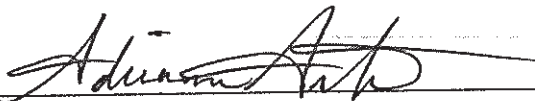
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Signature



Date

7/27/18

Name (Print)

Adrienne Avitia

City & State

Santa Fe, New Mexico

May Ma  
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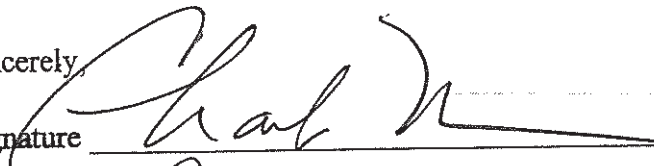
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Name (Print)

City & State

  
Date 7/27/18  
CHARLES MANN  
Santa Fe, NM

May Ma  
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U.S. Nuclear Regulatory Commission  
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Date

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City & State

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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.
- All possible human exposures from routine and accidental radioactive releases during transport and at the site must be clearly defined in plain language, for individuals near waste on occasion and workers who are transporting or working at the CIS site long-term.

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

Signature

Date

7-27-18

Name (Print)

Antonio Villeda

City & State

McAllen Tx 78504

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.
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Sincerely,

Signature

Name (Print)

City & State

Date

  
Date 7-27-18  
Name (Print) Crystal Carbajal  
City & State Santa Fe, NM

