

## Holtec-CISFEISCEm Resource

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**From:** Protecting NM From All Things Nuclear <protectnewmexico@gmail.com>  
**Sent:** Tuesday, July 31, 2018 3:25 AM  
**To:** Holtec-CISFEIS Resource  
**Subject:** [External\_Sender] Docket ID NRC-2018-0052 \_ NISG \_ PDF 69a of 72  
**Attachments:** NRC-2018-0052\_NISG-69a.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 69a.**

Leona Morgan, Co-Coordinator  
Nuclear Issues Study Group  
[protectnewmexico@gmail.com](mailto:protectnewmexico@gmail.com)  
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**Federal Register Notice:** 83FR13802  
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**Recipients:**

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

RE: Docket ID NRC-2018-0052; Holtec International's HI-STORE Spent Fuel Waste Facility

Nuclear Regulatory Commission:

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

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

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

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

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

**Holtec Must Remove Copyrights And All Redactions in the Environmental Report (ER)**

- NRC must require Holtec to produce an ER that has no such copyright restrictions and has no redactions. It is impossible to make recommendations on the scope of analyses of these redacted areas of the ER for the EIS.

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

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

**More Alternatives Must Be Analyzed**

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

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

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

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

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

**Cracked And Leaking Canisters Must Be Addressed**

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**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**

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**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 Benson Tapaha Jr Date 2/29/18

Name (Print) Benson Tapaha Jr

City & State White cone 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

7-26-18

Name (Print)

Priscilla A. Thomas

City & State

Crowspoint, 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 SR Date 7/26/18

Name (Print) Sarara Riggs

City & State Flagstaff, Arizona



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

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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.

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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 Patricia Beves Date 7-27-18  
Name (Print) Patricia Beves  
City & State Tijeras, NM

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

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Signature



Date

7-27-18

Name (Print)

Ivan Duran

City & State

Albuquerque, NM

7/30, 2018

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 and additional reprocessing waste—high-level radioactive waste—from nuclear reactors around the country to southeastern New Mexico for consolidated interim storage (CIS). I am submitting the following comments because **I do not consent to New Mexico becoming a national radioactive waste dump.** I do not consent to transporting up to 10,000 shipments of highly radioactive waste through thousands of communities nationwide to New Mexico with possibly another 10,000 shipments later to some as yet unknown repository. The transportation phase alone is reckless and the communities along the transportation routes are not adequately prepared to respond to a radioactive accident of this potential magnitude.

Holtec's application is for up to 120 years with a high possibility of waste remaining for at least 300 years. By that time the fragile, thin-walled containers will mostly likely be too delicate to move leaving all the nation's high level waste in a permanent, shallow landfill. The only benefit to New Mexico appears to be about 55 long-term jobs.

A public process at least as robust as that for the Yucca Mountain facility must be undertaken as the transportation routes go through most congressional districts, many major metropolitan areas, large amounts of agricultural land and environmental justice communities. Public scoping meetings must be held along the transportation routes including in the more than 20 cities through which this waste will be shipped.

Geological and hydrological investigations at least as robust and comprehensive as those for the Waste Isolation Pilot Plant (WIPP) must be undertaken as the site is a complex geological area with earthquakes, many natural resources, and karst formations including massive sinkholes. Those investigations were many and took years. Even if WIPP is sited on an island of non-karst in the middle of one of the largest karst areas in the world, the likelihood that Holtec is also sited in such a so-called safe area is remote; much more needs to be known about the geology and hydrology of the Holtec site before we can be sure it is safe. The studies for Holtec more resemble studies for a local gas station than those for a site planning to store and possibly dispose the most-deadly wastes in the entire nuclear fuel cycle.

Because the site is in one of the most heavily developed oil and gas areas in the country, the effects of fracking on the site, including a possible increase in man-made earthquakes must also be extensively studied.

**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.
- There is no current repository and it could be hundreds of years before one is created. In fact, there might never be a site chosen for this waste outside of New Mexico. Though New Mexico was promised that high level waste would never come to WIPP, WIPP could become that repository and already has modifications requests underway to increase its size and to allow it to accept high level waste.

**The Impacts Of Permanent Indefinite Storage (De Facto Disposal) 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**

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- The ER is inadequate and 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 ER is inadequate because it does not discuss the effects from normal facility transportation on communities and especially on communities of color.

#### **Economic Effects On Current New Mexico Industry And Agriculture Must Be Analyzed**

- Impacts of potential contamination on local dairy & pecan farms, tourism, cattle ranching and the oil and gas industries that employ more than 34,000 people must be analyzed.
- The total number of annual workers at the site could total as many as 135 when construction jobs are combined with the operating workforce. How many of the estimated 135 jobs will go to locals?
- Impacts of loss of income and property values from the *perception of contamination* even if it doesn't actually occur must also be analyzed. How many current jobs would be lost if no one wants to buy southeastern New Mexico cattle, dairy and agricultural products or our oil and gas because it's believed it *could* be contaminated?
- This analysis must be extended to current industries and agriculture along the transportation routes to see what effects an accident with and without a release would have on those local economies.

#### **Cracked And Leaking Casks 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 thin walled casks cannot be inspected nor can they be repaired if they are found to be leaking.
- The application assumes that both transportation and containment at the site for centuries to come will be perfect. This is unreasonable and irresponsible.

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

- The ER mentions WIPP but does not analyze the impacts of a radiologic release from WIPP on the proposed CIS site or how a release from Holtec could affect WIPP.

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- The ER does not analyze future railroads and electric lines that will be needed, but that are not yet in place.

#### **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 or a much larger earthquake will have on the buried casks. This is an area with a long history of fracking and unstable geology.

Sincerely,

Signed

Haley

Name (Print)

Haley Herrera-Jlana

City & State

Belen, NM 87108



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

RE: Docket ID NRC-2018-0052; Holtec International's HI-STORE Spent Fuel Waste Facility

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Signature



Date

7/21/18

Name (Print)

Lea Chiara

City & State

Easthampton MA

May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
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Signature Camela T. Leigh Date 7/21/18

Name (Print) Camela T. Leigh

City & State Rockport, MA.

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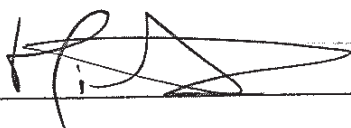
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Sincerely,

Signature



Date

7/21/18

Name (Print)

MICHAEL JACOBS

City & State

SANTA FE, NM

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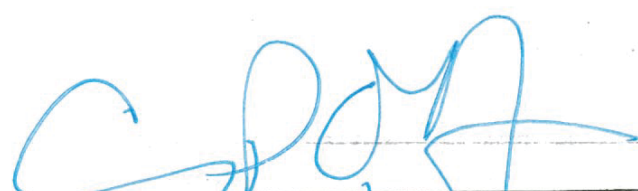
Sincerely,

Signature

Name (Print)

City & State

Date

  
Craig O'Hare  
Santa Fe, NM  
7/21/18



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

City & State SF, NM



May Ma  
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U.S. Nuclear Regulatory Commission  
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City & State

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U.S. Nuclear Regulatory Commission  
Washington, DC 20555- 0001

RE: Docket ID NRC-2018-0052; Holtec International's HI-STORE Spent Fuel Waste Facility

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Sincerely,

Signature

M. Heurion

Date

July 21, 2018

Name (Print)

Megan Heurion

City & State

Santa Fe, NM



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

Signature



Date

7/25/18

Name (Print)

KENNETH HARKER

City & State

Santa Fe 87505

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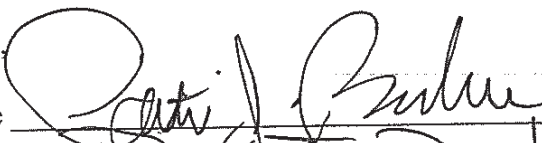
Sincerely,

Signature

Name (Print)

City & State

Date

  
Patricia J. Bushue  
Santa Fe, NM 87501

7/21/18



May Ma  
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Signature

Jane Brown

Date

7/21/18

Name (Print)

Jane Brown

City & State

W. Hartford, CT

May Ma  
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