

Holtec-CISFEISCEm Resource

From: Protecting NM From All Things Nuclear <protectnewmexico@gmail.com>
Sent: Tuesday, July 31, 2018 3:45 AM
To: Holtec-CISFEIS Resource
Subject: [External_Sender] Docket ID NRC-2018-0052 _ NISG _ PDF 70 of 72
Attachments: NRC-2018-0052_NISG-70.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 70.

Leona Morgan, Co-Coordinator
Nuclear Issues Study Group
protectnewmexico@gmail.com
+1 505 879 8547

Federal Register Notice: 83FR13802
Comment Number: 3293

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Subject: [External_Sender] Docket ID NRC-2018-0052 _ NISG _ PDF 70 of 72
Sent Date: 7/31/2018 3:45:00 AM
Received Date: 7/31/2018 3:46:25 AM
From: Protecting NM From All Things Nuclear

Created By: protectnewmexico@gmail.com

Recipients:

Post Office: gmail.com

Files	Size	Date & Time
MESSAGE	634	7/31/2018 3:46:25 AM
NRC-2018-0052_NISG-70.pdf		6254575
ATT00001.htm	496	

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

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

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

Nuclear Regulatory Commission:

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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

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Sincerely,

Signature

Name (Print)

City & State


LAURIE ACKLES
Rochester, NY

Date

7/21/18

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

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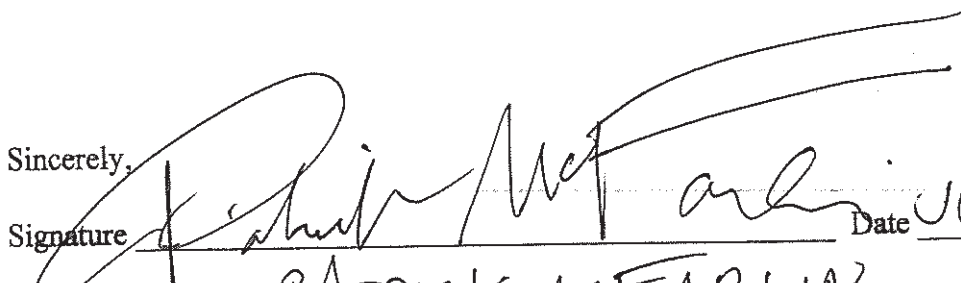
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Sincerely,

Signature

Name (Print)

City & State


Date JULY 21, 2018
PATRICK MCFARLIN
GALLISTED, 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 D. Madison Date 7.21.2018

Name (Print) Deborah Madison

City & State Gallup, NM 87540

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

Samantha A

Date

7/21/2018

Name (Print)

Samantha Christy

City & State

Tesque, NM

May Ma
Office of Administration
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David Caron

Date

7/21/18

Name (Print)

DAVID CARON

City & State

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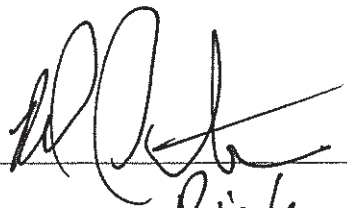
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Sincerely,

Signature



Date

7/26/18

Name (Print)

Rick Leisch

City & State

AL 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 Joan Varney Date 7/26/18
Name (Print) Joan Varney
City & State Albuquerque

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

Mark J. Bernstein Date July 26, 2018

Name (Print)

Mark J. Bernstein

City & State

Albuquerque, New Mexico

May Ma
Office of Administration
Mail Stop: TWFN-7- A60M
U.S. Nuclear Regulatory Commission
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Signature Vivian L. Doak Date 7/11/2018

Name (Print) Vivian L. Doak

City & State Albuquerque, NM 87105

May Ma
Office of Administration
Mail Stop: TWFN-7- A60M
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Washington, DC 20555- 0001

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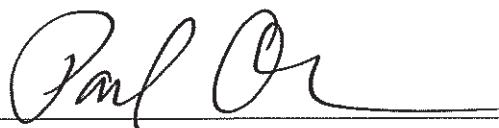
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Date

7-27-18

Name (Print)

Paul Cohen

City & State

Albuquerque NM 87190

May Ma
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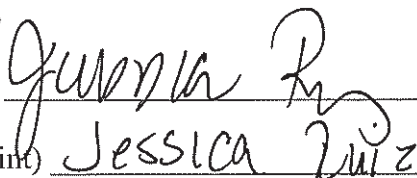
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Name (Print)

Jessica Ruiz

City & State

Abq NM

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Name (Print)

Anthony Lerma

City & State

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Signature Vincent Tronolone Date 07.26.2018

Name (Print) VINCENT TRONOLONE

City & State ALB, N.M

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

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

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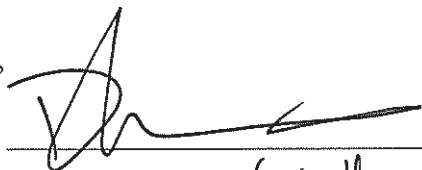
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Signature



Date

7/26/2018

Name (Print)

Demian Ginder

City & State

Albuquerque, NM

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

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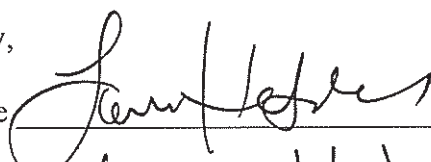
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Date

7/26/18

Name (Print)

Lauren Hutchison

City & State

ABQ, NM

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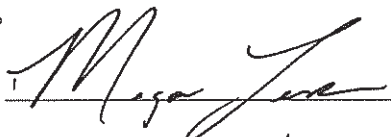
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Name (Print)

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City & State

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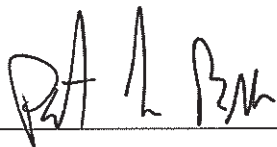
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City & State

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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.

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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.

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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

- 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.

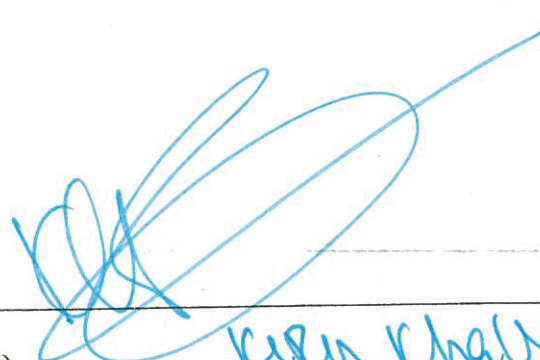
Sincerely,

Signature

Name (Print)

City & State

Date


Keren Chalutz
Santa Fe NM
7/21/18

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

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

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

Name (Print)

City & State

Margarita Mercure Hibbs Date *7/25/18*
Margarita Mercure Hibbs
Estancia, New Mexico 87016

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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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.

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Sincerely,

Signature  Date 7/11/2018

Name (Print) Crystal Pokagon

City & State Albuquerque, NM

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

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Sincerely,

Signature Matt Gray Date 7-25-18

Name (Print) Matt Gray

City & State Albuquerque NM

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

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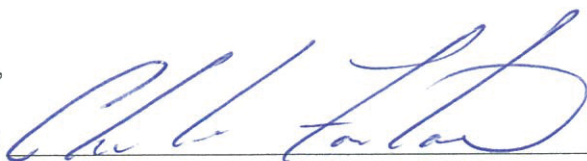
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Sincerely,

Signature



Date

July 25 2018

Name (Print)

Charles Fontana

City & State

ABQ, NM

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

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

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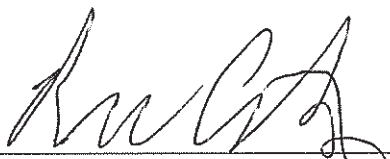
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Date

7/25/2018

Name (Print)

Brandi Coverly

City & State

Cedar Crest, New Mexico.

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

Signature



Date

7-22-18

Name (Print)

ELIZABETH DINEEN

City & State

ALBUQ. NM

87120

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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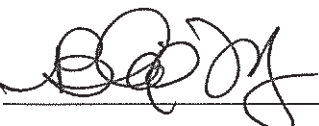
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Signature



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7/22/18

Name (Print)

Blair Vasquez

City & State

Alb NM

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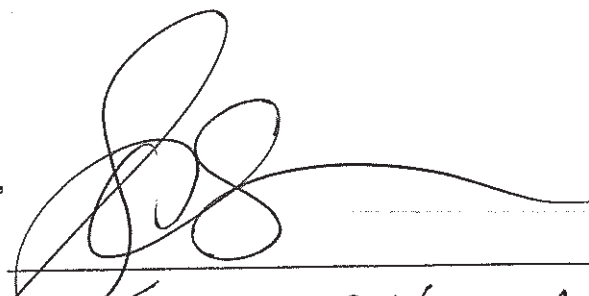
Sincerely,

Signature

Date

Name (Print)

City & State


Date 7-21-2018
Name (Print) G. V. CHANDEL KAGSA
City & State SF NM 87505

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

7-21-2018

Name (Print)

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City & State

SANTA FE NM 87501

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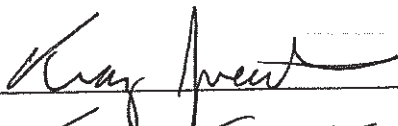
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Date

July 21, 2018

Name (Print)

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City & State

OKla City OK

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- 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 Roanne J. Wheeler Date 7-21-18
Name (Print) Roanne J. Wheeler
City & State Oklahoma City, OK

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

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

Nuclear Regulatory Commission:

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

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

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

This Holtec Proposal Is Contrary To Current Law

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

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

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

The Impacts Of Permanent Storage Must Be Analyzed

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

More Alternatives Must Be Analyzed

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

All Transportation Routes And Risks Must Be Analyzed

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

The Consequences To An Accident-Exposed Individual Must Be Analyzed

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

Cracked And Leaking Canisters Must Be Addressed

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

More Cumulative Impacts Must Be Analyzed

- 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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Sincerely,

Signature

Amy E Lindquist

Date

7/20/2018

Name (Print)

AMY E LINDQUIST

City & State

Santa Fe NM 87505

May Ma
Office of Administration
Mail Stop: TWFN-7- A60M
U.S. Nuclear Regulatory Commission
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Signature Stephen Verchinski Date 7/14/2018

Name (Print) STEPHEN VERCHINSKI

City & State ALBUQUERQUE, N.M. 87110

