

## Holtec-CISFEISCEm Resource

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**From:** kaleigh parker <kalashpar0219@gmail.com>  
**Sent:** Monday, July 30, 2018 4:34 PM  
**To:** Holtec-CISFEIS Resource  
**Subject:** [External\_Sender] #2018-0052  
**Attachments:** 2018-0052.pdf; #2018-0052.pdf

Collected from Eunice, New Mexico.

**Federal Register Notice:** 83FR13802  
**Comment Number:** 3300

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**Subject:** [External\_Sender] #2018-0052  
**Sent Date:** 7/30/2018 4:33:53 PM  
**Received Date:** 7/30/2018 4:34:24 PM  
**From:** kaleigh parker

**Created By:** kalashpar0219@gmail.com

**Recipients:**

**Post Office:** mail.gmail.com

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	34	7/30/2018 4:34:24 PM
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#2018-0052.pdf	1139570	

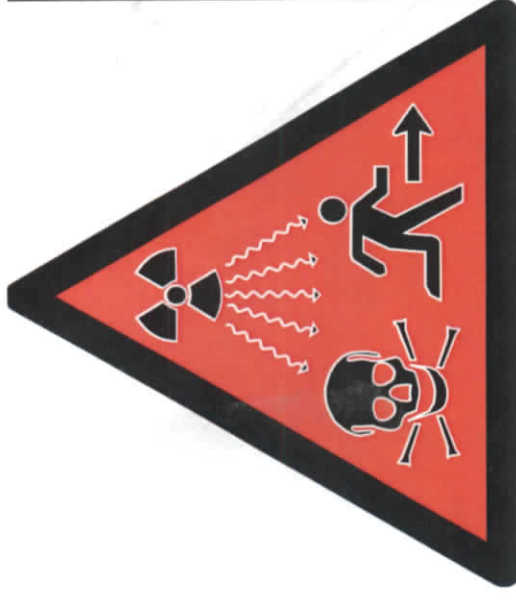
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# Halt Radioactive Waste Dumping on New Mexico and Texas!

Protect public health by preventing  
radioactive contamination of land & water

**We DO NOT CONSENT to the proposed storage of deadly high-level radioactive waste from US nuclear reactors around the county or transport of the waste for this purpose.**



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# Halt Radioactive Waste Dumping on New Mexico and Texas!

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5-8, 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 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 undo burden on the public to respond to this 543-page technical document. In addition, this overlaps several other comment periods in New Mexico, including three comment periods for the Waste Isolation Pilot Plant (WIPP) and one for Los Alamos National Laboratory.

I formally request that each of the 3 scheduled meetings have time for public comment, and that the Roswell Open House include a regular scoping meeting as well, or be cancelled. I also request additional Public Scoping Meetings for other New Mexico communities that will be impacted by the transport, including but not limited to: Albuquerque, Clovis, and Gallup and at least one in Dallas/Ft. Worth, San Antonio, and Midland, Texas since there would likely be extensive transport through these cities.

#### **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 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 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 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.

**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.

**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.

**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?**

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

**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.

I do not consent to this site being in my State,  
My Family Lives, & works here. We are not a dumping  
ground here. Leave it where it is!!!

Sincerely,

Signed Delphina Ortiz

Name (Print) Delphina Ortiz

City & State Eunice, NM 88231

May 2, 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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The Environmental Report inadequately discusses the transportation Risks

- This ER must include all transportation routes and the potential impacts of accidents or terrorist incidents on public health and safety along all the routes.
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- Terms like "collective dose risk" and "person-rem" are used to ignore the potential impacts to a single individual.

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.

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 CTS site.

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?

- The total number of new job workers at the site could total as many as 1,000. How many of these jobs are guaranteed with the operating agreement?

Seismic Impacts On Stored Casks Must Be Stated

- The design and strength of storage casks must take into account the seismicity of the area. The design of casks must be 3.0 - 4.0 shaking and must earthquake resistant in the design.

(Please, answer questions here.)

There is too much nuclear waste here.  
We don't need more!  
Let the people who made it keep it.  
It should be their problem not ours.

Kaleigh Parker  
Kaleigh Parker  
Eunice, NM

May 2, 2018

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

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Environmental Report Inadequately Discusses the Transportation Risks

- The ER must include all transportation routes and the potential impacts of potential transportation incidents on public health and safety along all the routes
- The ER is inadequate and incomplete because it does not discuss how rail shipments from the site without rail access could be accomplished and the risks and impacts of that shipment.

Transportation To An Accident-Exposed Individual Must Be Analyzed

- Terms like "collective dose" and "commitment" are used to ignore the potential impacts of a single individual.

Cracked And Leaking Casks Must Be Addressed

- The ER does not analyze exactly how radioactive waste from a cracked and leaking cask would be handled, since there is no wet pool or hot cell at the site.

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 facility.

Impacts Of Future Railroads And Electric Lines Must Be Analyzed

- Future railroads and electric lines are not in place yet must be analyzed.

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

- The ER says only 10% of the estimated 135 jobs will go to locals. The ER does not say how many jobs will go to non-locals.

Sanitary Impacts On Stored Casks Must Be Sintered

- The ER says that the casks will be stored in a "sanitary" area. The ER does not say how the casks will be stored and how they will be protected from the elements.

Environmental Impact Statement

Page 11



Tristan Sikes

Eureka, NM 88231



To the Nuclear Regulatory Commission:

I do not consent to New Mexico becoming a national radioactive waste dumping ground for all the high-level nuclear waste from commercial power plants nationwide. I do not consent to transporting up to 10,000 canisters of highly radioactive waste through thousands of communities nationwide. I support the alternative of Hardened On-Site Storage at or near reactor sites.

Name Tristram Sikes

Address 809 20<sup>th</sup> St

Euclid, NM 88231



To the Nuclear Regulatory Commission:

I do not consent to New Mexico becoming a national radioactive waste dumping ground for all the high-level nuclear waste from commercial power plants nationwide. I do not consent to transporting up to 10,000 canisters of highly radioactive waste through thousands of communities nationwide. I support the alternative of Hardened On-Site Storage at or near reactor sites.

Name

Lynda Stevens

Address

PO Box 601

Sunrise NM 88231

