

## Holtec-CISFEISCEm Resource

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**From:** Kim Young <kimsings3@yahoo.com>  
**Sent:** Tuesday, July 31, 2018 2:34 AM  
**To:** Holtec-CISFEIS Resource  
**Subject:** [External\_Sender] COMMENT TO the NRC on Docket ID NRC-2018-0052: Holtec International's HI-STORE Consolidated Interim Storage Facility Project

Dear Nuclear Regulatory Commission Staff:

I write to you due to my incredibly grave concern over the proposed Holtec interim storage facility project. This is a horrible plan and should be soundly rejected due to the many reasons for concern!! REJECT Holtec International's application for a Consolidated "Interim" Storage Facility (CISF) for high level nuclear waste first because centralized or consolidated interim storage sites are NOT allowed under US federal laws to the extent the Department of Energy and US taxpayers are expected to own and transport the waste. It is an ILLEGAL DUMP!! This should never be allowed anywhere!!!

REJECT and DO NOT RELY on the Environmental Report done by Tetra Tech for Holtec. A FRAUDULENT, CROOKED CONTRACTOR should NOT be doing the environmental analysis!! THIS WORK IS A SHAM!! For 20 years Tetra Tech has been falsifying radiation monitoring data, deliberately spreading radioactive soil and waste to previously clean places on and offsite, using unqualified workers to supervise radioactive scanning and cleanup efforts and suppressing and firing whistleblowers at the Navy's huge Hunters Point nuclear site in San Francisco, which is being converted to high-end housing. This is according to the US Navy, EPA and California Health Department!!! AGAIN, THIS IS ACCORDING TO U.S. GOVERNMENT DEPARTMENTS!!! Based on this track record, Tetra Tech CANNOT be trusted AT ALL to assess environmental impacts of the proposed Holtec dump!! TO ALLOW THEM TO DO THIS WOULD BE A TRAVESTY FOR EACH AND EVERY AMERICAN!!!!

The Holtec site VIOLATES ENVIROMENTAL and ECONOMIC JUSTICE!!! The proposed area has valuable industries including pecan, cattle ranches, dairy, and other local farming interests that would be absolutely threatened by the site. Even some of the hazardous and extractive industries that are a big part of the economy oppose the dump!!! New Mexico "has certainly suffered enough as a national sacrifice zone at the hands of the nuclear industry, including abandoned uranium mines, the Manhattan Project, Trinity Test, plutonium contamination in the rivers downstream from Los Alamos, uranium enrichment, and hosting the nation's transuranic waste at the Waste Isolation Pilot Plant. ENOUGH IS ENOUGH!!!! As one of the poorest states, and a majority minority state, New Mexico has experienced severe environmental racism for decades. People of Color continue to be disproportionately impacted by hazardous and toxic wastes." (Samia Assed, Chair of the New Mexico Poor People's Campaign; see: [www.nonuclearwaste.org](http://www.nonuclearwaste.org)) NRC should assess the multiple stresses on New Mexicans and failures to compensate them over the history of the atomic age.

CASK DANGERS. None of today's certified waste containers are actually designed for real world transport conditions (temperatures, crash speeds, submersion in deep water) and have not been physically tested despite dump-promoter's misuse of 40 year-old crash-test videos on totally different casks. This is a serious problem!!! The storage containers CANNOT be monitored for potential cracks and leaks, inspected, repaired or replaced even though we know the waste will be dangerous much longer than they will last!!! THIS ALONE IS A DAMING FACT AND MUST BE TAKEN INTO ACCOUNT!! The technology is in the "future" according to NRC staff. Nuclear Regulatory Commission (NRC) should include evaluation of moving 10's of 1000's of shipments of the most deadly radioactive waste in super-heavy, inadequate containers over deteriorating railroad tracks, roads and bridges...impacts from MANY thousands of shipments on infrastructure, on people, businesses, communities, resources all along the way!

HOTTER HIGH LEVEL WASTE. NRC should include full evaluation of “high burn-up” fuel. It is a significant portion of the waste that would go to Holtec.

EMERGENCY RESPONSE. Assess and report on the reliability and capability of volunteer and distantly-located emergency response personnel upon which the site will rely. Include availability, training, equipping and notification of emergency responders all along the routes. THIS IS CRUCIAL!!!

HARSH ENVIRONMENT. Consider, in more than a cursory dismissive way, the decades of high temperatures, salty dry climate, potential flash floods, lightning, burrowing animals, sand, blocked vents, wind, rain, fire on the casks and waste. Assume increased earthquake risks and other impacts from fracking (which is UNBELIEVABLE not prohibited) near and under the site!!!! Totally inadequate planning!!!

CONSOLIDATED “INTERIM” STORAGE (CIS) COULD BECOME PERMANENT. NRC must analyze the consequences of the waste remaining indefinitely at the site...never moving to another location. Holtec proposes to “consolidate” up to 173,600 metric tons (TONS!!!!) of high-level waste from all US nuclear power reactors to New Mexico, near the famous Carlsbad Caverns, to “temporarily” store for 40-120 years!!!! THIS IS INSANE!!!! (It could take 40+ years to move it there!) The waste would allegedly be moved again, but if no permanent site is found or money to move it again never appears, it could stay forever, despite NOT being designed for permanent isolation!! THIS TYPE OF "PLAN" SHOULD NEVER BE ALLOWED TO GO FORWARD!!!!

REPROCESSING + PROLIFERATION DANGER. NRC, analyze the possibility of the waste being reprocessed at the site, since consolidating waste is the first step to dangerous reprocessing to extract plutonium, increasing nuclear weapons proliferation, massive water use and intense, irreversible environmental contamination. Reprocessing was proposed at this same site before and must be addressed in the EIS.

ALL the points above are crucial and MUST be addressed without delay. This current "plan" is horrible flawed and should never be allowed due to the incredible amount of extreme dangers involved for millions of people both now and for many, many generations into the future!!!! PLEASE SAY NO TO THIS HORRIBLE PLAN!!!!

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**Federal Register Notice:** 83FR13802  
**Comment Number:** 3452

**Mail Envelope Properties** (750193912.3880.1533018837967.JavaMail.tomcat)

**Subject:** [External\_Sender] COMMENT TO the NRC on Docket ID NRC-2018-0052:  
Holtec International's HI-STORE Consolidated Interim Storage Facility Project  
**Sent Date:** 7/31/2018 2:33:57 AM  
**Received Date:** 7/31/2018 2:34:06 AM  
**From:** Kim Young

**Created By:** kimsings3@yahoo.com

**Recipients:**

**Post Office:** vweb69

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	6075	7/31/2018 2:34:06 AM

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