

## Holtec-CISFEISCEm Resource

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**From:** Joan Brown,osf <joankansas@swcp.com>  
**Sent:** Monday, July 30, 2018 11:45 AM  
**To:** Holtec-CISFEIS Resource; joan m brown  
**Subject:** [External\_Sender] Docket ID NRC- 2018-0052  
**Attachments:** general public holtec letter comments may 2018.docx

Please see attached comments. Thank you, Joan Brown,osf

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Joan Brown,osf  
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"There is no inner world without the outer world." Thomas Berry, Author of The Great Work

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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**

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.

**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.

**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 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.

**Cracked And Leaking Casks Must Be Addressed**

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

**Impacts Of Future Railroads And Electric Lines Must Be Analyzed**

- The railroads and electric lines are not in place, but must 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.

Sincerely,

Sr. Mary Carol Zabinskeus, osf, Colorado Springs, Colorado  
Martha Crowley, Denver, Colorado  
Patricia McCormick, sl, Denver, Colorado  
Patrick Buckley, Denver, Colorado  
Sister Judith Schaeffer, Colorado Springs, Colorado  
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Signed \_\_\_\_\_

Name (Print) \_\_\_\_\_

City & State \_\_\_\_\_