

Holtec-CISFEISCEM Resource

From: Daniel Gartner <danwgartner47@gmail.com>
Sent: Friday, July 27, 2018 1:57 PM
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:

Please reject Holtec International's application for a Consolidated "Interim" Storage Facility (CISF) for high level nuclear waste in southeast New Mexico. This interim storage will either become permanent, which it is not designed for because high level waste cannot confidently be stored at that location for 10,000 years; or, the waste will have to be transported a second time to a new permanent facility. The risks of transporting nuclear waste are high; the risks involved in a second transport are unacceptably high.

Please reject and do not rely on the Environmental Report done by Tetra Tech for Holtec. 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 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. Based on this track record, Tetra Tech cannot be trusted to assess environmental impacts of the proposed Holtec site.

The Holtec site would put at risk valuable industries including pecan, cattle ranches, dairy, and other local farming interests that would be threatened. Even some of the hazardous and extractive industries that are a big part of the economy oppose the dump. New Mexico "has 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. As one of the poorest states, and a majority minority state, New Mexico has experienced 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) NRC should assess the multiple stresses on New Mexicans and failures to compensate them over the history of the atomic age.

None of today's certified waste containers are 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. The storage containers cannot be monitored for potential cracks and leaks, inspected, repaired or replaced even though we know the waste will be dangerous longer than they will last. The technology is in the "future" according to NRC staff. Nuclear Regulatory Commission (NRC) should include evaluation of moving tens of thousands of shipments of the most deadly radioactive waste in super-heavy, inadequate containers over deteriorating railroad tracks, roads and bridges.

NRC should include full evaluation of "high burn-up" fuel. It is a significant portion of the waste that would go to Holtec.

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 not prohibited) near and under the site!

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Holtec International's HI-STORE Consolidated Interim Storage Facility Project
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