

Holtec-CISFEISCEm Resource

From: Frances Hinckley <francesbiz@yahoo.com>
Sent: Friday, July 27, 2018 4:32 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.

Nuclear waste is not something to treat in anyway other than with the utmost respect that it kills.
And kills e-v-e-r-y-t-h-i-n-g.

Additionally, this proposal is illegal, unsafe on multiple levels and not properly studied for possible impacts.

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. This fact makes the proposed dump ILLEGAL.

Additionally, "interim" is not likely. I know of "temporary" buildings that were build during world war 2 that were still standing, and being used, fifty years later. For all I know they are still in use today. No site should be allowed to be interim, other than the place where the nuclear waste is created.

Nuclear waste is not something that can be handless without extreme forethought. Honestly, would you like to have it zooming down your closest highway everyday? Or stored near your loved one's home? I doubt it.

Thus, we need to do the job absolutely right and go to the trouble of actually doing all the Environmental Impact Reports/Statements that might be even remotely beneficial, by people who are proven to be trustworthy and have a track record of being scrupulously honest.

First off, we need review this dump as permanent, not temporary.

We need to look at the size, the siting, the proximity to people, ground water and anything else that might be "downstream" or "downwind."

We also need to evaluate the likelihood of seismic activity, with the understanding that fracking has increased seismic all around the country. So, we need to look at what sort of fracking has happened, or could possibly happen, in the area. This may lead to the need for a new law disallowing any kind of fracking within a certain radius. Apparently, the fracking industry is already concerned about this possibility.

Looking at seismic activity is only one part of the necessity of looking at disaster scenerios. Others would include breaches of any kind including those of terrorist intent.

As part of the evaluation of potential breaches of every kind, we need to look at how any potential accident or terrorist attack might be handled and what immediate resources are in place to address and contain any such possibilities. Even a one day delay in an ability to respond in a comprehensive manner would be devastating to our nation.

Any type of nuclear waste storage needs to be looked at very carefully, in a comprehensive, long term way. That is why "interim" storage is illegal.

So, I am very concerned about the incomplete way that this is being proposed.

Additionally, I am concerned about the sheer size of this. I would like us to carefully look at if that makes the US more secure or less secure? I do not know and I feel it is something we really need to study. The areas that jump out at me are an accidental release, a natural disaster release, and a nefarious release, but there could be others that are not obvious. Each of these needs to be looked at and the possibility of others should also be investigated.

This "interim" dump would be the largest in the world! I really do not see how that fact can co-exist with the idea of "interim."

As I alluded to, I do not think most people are comfortable with the idea of nuclear waste traveling down the road, or railroad track, near them or their loved ones. If this were an interim, or temporary facility, that would mean that at some future point, the waste would be moved. This unnecessarily doubles the amount of time the waste spends traveling across our country and statistically makes it much more likely for that waste to be in some sort of accident in transport. And our natural discomfort is well founded: the containers, or casks are simply not actually safe for transport.

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 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.

These investigations/studies/reports should be done by someone other than anyone with any interest related to any potential contractor.

I also have grave concerns about Tetra Tech and do not think any report from them can, nor should, be trusted.

According to the US Navy, the EPA and the California Health Department, for more than 2 DECADES, Tetra Tech has been known to 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. Tetra Tech suppressing and firing whistleblowers at the Navy's huge Hunters Point nuclear site in San Francisco, which is being converted to high-end housing. Based on this documented history, Tetra Tech cannot be trusted to assess environmental impacts of the proposed Holtec dump. Honestly, they should no longer be in business and those responsible should be in jail.

Furthermore, I am concerned about these items:

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.

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 not prohibited) near and under the site!

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 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. (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.

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. Therefore it is imperative that this be addressed in the EIS.

Lastly, but far from least important, is the fact that 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.

Lastly, I am concerned that there are things no one has thought of yet, that would only come to light if we invested the time to look at this carefully and honestly.

Thank you for your time and consideration.

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