

## Holtec-CISFEISCEm Resource

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**From:** William moody <WMOODY1@ATT.NET>  
**Sent:** Friday, July 27, 2018 10:57 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:

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 this type of waste. It is an ILLEGAL DUMP. Spent fuel and toxic waste is accumulating on the sites of Nuclear Power Plant owners, who should retain full responsibility for safety and all costs of finding publicly acceptable permanent storage sites, transport methods and adequate maintenance and monitoring until all dangerous radioactive material has subsided.

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. 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 information. Based on this terrible track record, Tetra Tech cannot be trusted to assess potential environmental impacts of the proposed highly sensitive and broadly volatile Holtec dump. Certainly, all involved in such fraudulent operations should be properly prosecuted!

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 threatened, possibly with disaster 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 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 and ethnic oppression for many 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 long experimental history of the atomic age.

CASK DANGERS. 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 types of 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 their containers will last! The supposed necessary technology might be discovered "in the "future" according to NRC staff. The 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, and resources all along the way of every expected route.

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 physical and chemical characteristics of the casks and the 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, or virtually Forever at this 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 the money required to move it again never appears, it could take thousands of years before the projected tons of dangerous debris is sufficiently "cooled " down here, despite not being designed for permanent isolation and protection!

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

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