

Holtec-CISFEISCEm Resource

From: John Zemblidge <zemcom@cox.net>
Sent: Saturday, July 28, 2018 8:11 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:

As a concerned citizen who resides in Arizona, I ask you to reject Holtec International's application for a Consolidated "Interim" Storage Facility (CISF) in New Mexico for high level nuclear waste.

I have studied information disseminated by the Nuclear Information and Resource Service (NIRS) and ask you to NOT rely on the "environmental report" done by Tetra Tech for Holtec. A paid contractor for Holtec should not be doing the environmental analysis. It is my understanding that the United States Navy, the Environmental Protection Agency, and the California Department of Health have all determined that Tetra Tech has for 20 years been falsifying radiation monitoring data, 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 whistle blowers at the Navy's huge Hunter's Point nuclear site in San Francisco. This site is now being converted to high-end housing. Based on Tetra Tech's track record, it cannot be trusted to assess environmental impacts of the proposed Holtec dump.

In addition, the Holtec site in New Mexico has valuable industries including pecan, cattle, dairy, and other local farming interests that would be threatened by the site. Even some of the hazardous and extractive industries which 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 since the early 1940's. New Mexico has experienced environmental racism for decades. People of Color and indigenous Americans 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)

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 Holtec's misuse of 40 year-old crash-test videos on totally different casks. The casks 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. This technology is in the "future" according to Nuclear Regulatory Commission (NRC) staff. NRC should evaluate the safety 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...impacts from many thousands of shipments on infrastructure, people, businesses, communities, and other resources all along the way

HOTTER HIGH LEVEL WASTE: NRC should include full evaluation of "high burn-up" fuel. It is my understanding that it makes up a significant portion of the waste that would go to the proposed Holtec site.

EMERGENCY RESPONSE: NRC should assess and report on the reliability and capability of volunteer and distantly-located emergency response personnel upon which the site will rely. The assessment should include availability, training, equipping and notification of any and all emergency response personnel along the routes.

HARSH ENVIRONMENT: Any assessment should consider, in more than a cursory or 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. This assessment should also take into account 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 being moved to another location. Holtec International proposes to "consolidate" up to 173,600 metric tons of high-level waste from all U. S. nuclear power reactors to New Mexico, near the famous Carlsbad Caverns, to "temporarily" store for 40-120 years. (It could take 40 or more years to move it there.) The waste would allegedly be moved again, but if no permanent site is found or money appropriated to move it, the site could stay forever, despite not being designed for permanent isolation.

REPROCESSING and PROLIFERATION DANGER: The NRC must 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.

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