

Holtec-CISFEISCEm Resource

From: R. McDonough <beckymcdonough@gmail.com>
Sent: Saturday, July 28, 2018 10:46 AM
To: Holtec-CISFEIS Resource
Subject: [External_Sender] Please Stop the Holtec Nuclear Waste Dump

I urge you to halt this dreadful idea for the following reasons:

1. ILLEGAL PLAN--

NRC must REJECT Holtec International's application for a Consolidated "Interim" Storage Facility (CISF) for high-level nuclear waste because Holtec only intends to operate the dump if the Department of Energy and US taxpayers take over ownership of the waste and pay to transport it across the country. This arrangement is NOT allowed under US federal laws.

2. CROOKED CONTRACTOR--

Tetra Tech, the contractor Holtec chose to prepare the Environmental Report on the proposed site, has a history of falsifying radiation monitoring data; deliberately spreading radioactive soil and waste to uncontaminated areas (on and off site); employing unqualified workers to supervise radioactive scanning and cleanup efforts; and suppressing and firing whistleblowers for 20 years at the Navy's huge Hunter's Point nuclear site in San Francisco that 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 the environmental impacts of the proposed Holtec dump. Tell NRC not to rely on and to reject the Tetra Tech Environmental Report on the site.

3. 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 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 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)

4. CASK DANGERS--

None of today's certified waste containers are designed for real world transport conditions (fire temperatures, crash speeds, extended submersion in deep water) and have not been physically tested despite dump-promoters' 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 the containers will last. The technology is in the "future" according to NRC staff. Tell the Nuclear Regulatory Commission (NRC) to prevent tens of thousands of shipments of the most deadly radioactive waste in super-heavy, inadequate containers over deteriorating railroad tracks, roads and bridges.

5. 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.

6. EMERGENCY RESPONSE--

Ask NRC to 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 to emergency responders all along the way for radioactive accidents and attacks.

7. HARSH ENVIRONMENT--

Tell NRC to 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. Tell them to assume increased earthquake risks and other impacts from fracking (which is not prohibited) near and under the site! Include other concerns. Plan for climate change and unpredictable conditions in the EIS.

8. CONSOLIDATED “INTERIM” STORAGE (CIS) COULD BECOME PERMANENT—

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 move 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.

9. REPROCESSING + PROLIFERATION DANGER—

Consolidating waste could lay the groundwork for the first step to dangerous nuclear reprocessing to extract plutonium, increasing the risks of nuclear weapons proliferation, massive water use and intense, irreversible environmental contamination. Reprocessing was proposed at this same site before and must be addressed in the EIS.

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