

Holtec-CISFEISCEM Resource

From: Therese Willkomm <twillkomm@comcast.net>
Sent: Monday, July 30, 2018 3:09 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:

The Holtec International's application for a Consolidated Interim Storage Facility (CISF) for high level nuclear waste is a wrong approach to decades of radioactive decay. First, under current Federal guidelines, the centralized or consolidated interim storage sites are NOT allowed.

Based on their track record, Tetra Tech cannot be trusted to assess environmental impacts of the proposed Holtec dump.

CASK DANGERS. None of the New Hampshire located certified waste containers are designed for interstate transport conditions over land or sea (temperatures, crash speeds, submersion in deep water) and have not been physically tested. Our storage containers cannot be monitored, inspected, NRC should include evaluation of moving first 10 of the proposed shipments of the most deadly radioactive waste in super-heavy, inadequate containers over deteriorating railroad tracks and roads. We do not currently have an adequate evacuation plan from the 'hot zone' in NH or MA around the deteriorating Seabrook Station that stores decades old spent fuel. Similarly, the impacts from many thousands of shipments on infrastructure, on people, businesses, communities, resources all along the way are in need of double blind independent study for public safety and radiation hazard. NRC should include full evaluation of "high burn-up" fuel. It is a significant portion of the waste that would go to Holtec.

Test, assess and report data regarding the reliability and capability of radiation emergency response personnel upon which the routes and proposed site will rely. Include availability, training, equipping and notification of emergency responders all along the proposed interstate routes.

"INTERIM" STORAGE (CIS) tends to become PERMANENT solution for the El Paso/Las Cruces metro areas. 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.

Determine the definition of "temporarily" storage - as proposed for 40-120 years, while could take 40+ years just to move the hazardous cargo 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.

The waste will not be reprocessed at the site, since consolidating waste is the first step to dangerous reprocessing. Looking at the Russian and French new technologies to extract plutonium and subsequent radioactive materials does provide a perception of increased nuclear proliferation. Furthermore, water treatment of the massive water quantity needed for the reprocessing, and intense, irreversible environmental contamination is not sufficiently vetted. Reprocessing was proposed at this same site before and must be addressed in the Holtec inadequately prepared proposal.

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