

## Holtec-CISFEISCEm Resource

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**From:** Doug Bogen <dbogen@metrocast.net>  
**Sent:** Monday, July 30, 2018 3:55 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:

I am very concerned about the rush to create an "interim" storage site for our nation's high level nuclear waste. I live near one of the nuclear plants that would be sending its waste to this site, and while it does need to be moved eventually (being on the coast and subject to sea level rise), I DO NOT want it dumped on some other poor community so that one corporation can profit off the process while others get let off the hook for storing this waste in a responsible manner.

You must reject Holtec International's application for a Consolidated "Interim" Storage Facility (CISF) for high level nuclear waste, primarily 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 the waste. It is an ILLEGAL DUMP.

Reject and do not rely on the Environmental Report done by Tetra Tech for Holtec. A legally-suspect 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. Based on this track record, Tetra Tech cannot be trusted to assess environmental impacts of the proposed Holtec dump.

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 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](http://www.nonuclearwaste.org)) NRC should first assess the multiple stresses on New Mexicans and failures to compensate them over the 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 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.

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. The waste from my area would have to travel the farthest of any in the country to this site, so the likelihood of it being involved in an accident or otherwise leaking is all the more greater.

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 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. I have looked at satellite photos of this site, and it appears surrounded by oil/gas drill pad sites - the use of which has been known elsewhere to have an effect on the geologic stability of an area.

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. You 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 in the EIS.

Please consider these points as well as others being raised by affected people around the country before you decide whether to approve or reject this application. Thank you.

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