

## Holtec-CISFEISCEm Resource

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**From:** Jeffrey J. Smith <[yswolffhowl@gmail.com](mailto:yswolffhowl@gmail.com)>  
**Sent:** Monday, July 30, 2018 4:21 PM  
**To:** Holtec-CISFEIS Resource  
**Subject:** [External\_Sender] Reject Holtec International's application for a Consolidated "Interim" Storage Facility (CISF) for high level nuclear waste.

July 30, 2018

To: Nuclear Regulatory Commission – Holtec

From: Jeffrey J. Smith – [yswolffhowl@gmail.com](mailto:yswolffhowl@gmail.com)

Dear Nuclear Regulatory Commission Staff:

### **Reject Holtec International's application for a Consolidated "Interim" Storage Facility (CISF) for high level nuclear waste.**

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 to 120 years.

This is not temporary storage in any way, shape, or form. This is an accident waiting to happen, a convenience for the nuclear industry that, odds are, will turn deadly for average American citizens.

The Environmental Report done by Tetra Tech for Holtec is inadequate if not fraudulent. Tetra Tech is a bad actor with a bad track record. According to the US Navy, EPA, and California Health Department, for 20 years Tetra Tech has been falsifying radiation monitoring data, deliberately spreading radioactive soil and waste to previously clean places on and offsite. Tetra Tech has been 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. Tetra Tech cannot be trusted to assess environmental impacts of the proposed Holtec dump.

Centralized or consolidated interim storage sites are NOT allowed under US federal laws. It is, therefore, an illegal dump.

The Holtec site has valuable industries including pecan, cattle ranches, dairy, and other local farming interests that would be threatened by the site. Businesses in the area oppose the dump.

None of today's certified waste containers have been tested. The dump-promoter's uses a 40-year-old crash-test video, which analyses affects on totally different casks. The storage containers will not last.

Nuclear Regulatory Commission (NRC) staff should evaluate the transportation of tens of thousands of shipments of deadly radioactive waste in super-heavy, inadequate containers over deteriorating railroad tracks,

roads, and bridges. Thousands of shipments will adversely affect infrastructure, people, businesses, communities, and natural resources along the way.

A significant portion of the waste that would go to Holtec is “high burn-up” fuel. NRC should include full evaluation of the safety of storing this fuel.

NRC must assess and report on the reliability and capability of volunteer and distantly-located emergency response personnel, upon which the site will rely. NRC must evaluate availability, training, equipping and notification of emergency responders all along the transportation routes.

NRC must consider in the most detailed way possible the natural conditions at the site. Specifically, the agency must evaluate the safety impacts of decades of high temperatures, salty dry climate, potential flash floods, lightning, burrowing animals, sand, blocked vents, wind, rain, fire on the casks and waste. Increased earthquake risks and impacts from fracking (which is not prohibited) near and under the site should be part of this analysis.

Reprocessing was proposed at this same site before and must be addressed in this EIS. Reprocessing waste at the site to extract plutonium is a wholly different environmental impact study because it will increase nuclear weapons proliferation, use massive amounts of water, and result in irreversible environmental contamination.

Finally, this waste could stay forever, despite this site not being evaluated for or designed for permanent isolation.

**Reject Holtec International’s application for a Consolidated “Interim” Storage Facility (CISF) for high level nuclear waste.**

Jeffrey J. Smith

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