

## Holtec-CISFEISCEm Resource

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**From:** Ned Flaherty <Ned\_Flaherty@msn.com>  
**Sent:** Monday, July 30, 2018 4:27 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:

Reject Holtec International's application for a Consolidated "Interim" Storage Facility (CISF) for high level nuclear waste because such interim storage sites are unlawful to the extent the DoE and U.S. taxpayers must own and transport the waste.

Reject the Holtec Environmental Report authored by Tetra Tech, a fraudulent, disqualified contractor. The U.S. Navy, EPA, and CA Health Department proved that over 20 years Tetra falsified radiation monitoring data, spread radioactive soil / waste, used unqualified workers in radioactive scan / cleanup work, and suppressed and fired whistleblowers at the Navy's Hunters Point nuclear site in San Francisco.

Holtec's site VIOLATES ENVIROMENTAL and ECONOMIC JUSTICE. The site threatens valuable industries (pecan, cattle, dairy, etc.).

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

---- New Mexico Poor People's Campaign Chair

---- [www.nonuclearwaste.org](http://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 none have been physically tested. The storage containers cannot be crack/leak monitored, inspected, repaired, or replaced even their waste will remain toxic longer than the containers will last.

Nuclear Regulatory Commission (NRC) should evaluate moving 10's of 1000's of shipments of the most deadly radioactive waste in super-heavy, inadequate containers over deteriorating railways, roads, and bridges.

HOTTER HIGH LEVEL WASTE. NRC should fully assess "high burn-up" fuel because it is a major portion of the Holtec waste.

EMERGENCY RESPONSE. Evaluate the capacity of all emergency response personnel upon which the site depends in terms of availability, training, equipment, and notification.

**HARSH ENVIRONMENT.** Thoroughly consider the decades of high temperatures, salty dry climate, potential flash floods, lightning, burrowing animals, sand, blocked vents, wind, rain, and fire on the casks and waste. Report on the increased earthquake risks and other fracking-related impacts.

**CONSOLIDATED “INTERIM” STORAGE (CIS) COULD BECOME PERMANENT.** NRC must analyze the consequences of the waste remaining at the site indefinitely. Holtec 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. The move alone could take over 40 years. If no permanent site is declared, or no funding appropriated, then it could stay put forever.

**REPROCESSING + PROLIFERATION DANGER.** NRC must analyze waste re-processing, including plutonium extraction, nuclear weapons proliferation, massive water use, and intense, irreversible environmental contamination.

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