

Holtec-CISFEISCEm Resource

From: Ace Hoffman <rhoffman@animatedsoftware.com>
Sent: Monday, July 30, 2018 4:47 PM
To: Holtec-CISFEIS Resource
Subject: [External_Sender] Docket ID NRC-2018-0052: Holtec International's HI-STORE Consolidated Interim Storage Facility Project

July 27, 2018

The Honorable Jeff Steinborn
P.O. Box 562
Las Cruces, New Mexico 88004

Subject: A response to Dr. Kris Singh's letter of July 16, 2018 regarding "misinformed activists"

Dear Senator Steinborn,

Despite Dr. Singh's stinging and inaccurate comments in his letter of July 16, 2018, we did NOT attend three Nuclear Regulatory Commission hearings in New Mexico in May in order to "spread lies and innuendos" and "slaughter the truth with impunity." His comments are libelous and inappropriate.

First of all, I stand by everything I stated at those hearings. For example, I stated at the hearing in Carlsbad that a typical 5/8ths-inch thick dry cask is approximately the proportionate thickness of an eggshell. The wall of a dry cask is about 1.6% the diameter of the dry cask. An egg shell is about 1.25% the thickness of an egg -- less than half a percent difference. And a dry cask must carry about three times the density of an egg. Dr. Singh refers to these thin-walled canisters as "unconditionally safe storage units." They are anything but!

Second, as a resident of Carlsbad, California, approximately 15 miles from the largest nuclear waste dump in America (San Onofre), it would be in my personal best interest to get the waste moved and force it on New Mexico, as Dr. Singh wishes to do. However when we visited New Mexico we had a lovely time, the people were friendly, and we went to a variety of museums including the Bradbury Museum, the Los Alamos History Museum, the National Museum of Nuclear Science & History, the Indian Pueblo Cultural Center, the New Mexico Museum of Space History, White Sands National Monument and the Sky City Cultural Center/Haak'u Museum. People visiting these museums provides far more jobs and income than Holtec's nuclear waste dump could ever bring! An accident during shipment or storage would affect the attendance at every one of these museums and many others.

Third, I have been studying nuclear issues for more than 40 years (I have a personal collection of over 500 books on nuclear issues, and have read scores of them cover-to-cover (both pro and con)). I have interviewed and corresponded with dozens of nuclear scientists, nuclear physicists, and medical doctors who have educated themselves about nuclear issues.

I want to bring your attention to three documents I have created which are relevant to the issue of bringing the country's nuclear waste to the proposed Holtec site in New Mexico:

1) My own book on nuclear issues, called The Code Killers. The title refers to the destruction of DNA by radioactive substances. I wrote The Code Killers during a three-month period after learning that I had bladder cancer about 13 years ago. Bladder cancer is sometimes a fatal disease and I wanted to make sure the things I learned could be passed on to others. I have made the book available at no charge online at my personal web site (www.acehoffman.org) and gave out approximately 150 copies while in New Mexico. If you look at the book, please note especially page 17, which

discusses radioactive plumes after an accident, using charts by various scientific organizations and committees to show how far the radionuclides can spread. Carlsbad Caverns, which we enjoyed prior to the Carlsbad, New Mexico NRC hearing, would probably have to close permanently after an accident either at the Holtec site or during transport to/from the site. Albuquerque, Santa Fe, and Las Cruces might all have to be abandoned, along with every town between those cities and the Holtec waste dump.

2) My review of dozens of previous books that have been written about nuclear waste issues (all are from my collection). These books clearly show that, despite tens of billions of dollars and countless millions of hours of research, no good solution to the problem of finding a permanent waste solution has ever been found. The Holtec site will have no choice but to become a permanent waste repository, until such time as most of New Mexico and parts of Texas and northern Mexico need to be abandoned after an accident. Here is the URL for that article, titled Nuclear Waste Management: The View Through the Years:

<http://acehoffman.blogspot.com/2017/10/nuclear-waste-management-view-through.html>

3) There is a better solution, which needs to take place at the sites where the nuclear waste has been produced. It is called Neutralization. The concept was invented by Dr. Peter Livingston, and took seven years to obtain a patent -- but he succeeded. Dr. Livingston is a former Nevada Test Site scientist who studied, among other effects of atomic explosions: the Electro-Magnetic Pulse (EMP), pressure waves, and radiation levels. (I met Dr. Livingston at the National Atomic Testing Museum in Nevada several years ago). Last November, shortly after his patent was finally approved by the U.S. Patent Office, I wrote a review of the process for the lay person, which is available here:

<http://acehoffman.blogspot.com/2017/11/what-is-spent-nuclear-fuel.html>

Please note with reference to that article that, despite Dr. Singh's entirely undeserved and inaccurate comments about "outsiders" who "don't have a stake in the local community" it is he, and his team, who have been misleading the citizens of New Mexico about jobs and financial benefits of the Holtec waste dump, as well as about the dangers of nuclear waste storage, AND, most of all, about the long-term prospects for how long the waste will stay in New Mexico. When I attended the hearings, I gave copies of the neutralization essay to Holtec's most technical specialist present, who assured me he would review the document and make any critical comments he had. After nearly two months, he has not made any comment whatsoever. This should hardly be surprising because it's a MUCH better plan! Neutralization eliminates the risk of a criticality event, which is the most serious concern regarding spent nuclear fuel. (For example, San Onofre's chief of nuclear operations, Tom Palmisano, has stated that preventing a criticality event in the fuel is the #1 priority of spent fuel management.) Neutralization also reduces the storage requirements from hundreds or even thousands of millennia to approximately half a millennia -- which is still a long time, but less than 1/2 of 1% as long as is required for untreated spent fuel. Neutralization also eliminates the possibility of later separating out the fissile materials for use in a nuclear bomb (otherwise that danger exists for the full length of time the waste is hazardous). These are only some of the benefits, others are included in the essay.

If Dr. Singh's biography (included in his letter to you) included a medical degree in radiation hazards, his views on the dangers of his plan to move all the nuclear waste in America to New Mexico might be more meaningful. If he concerned himself with the statistical dangers of transport by rail (such as the two derailments in eastern New Mexico last weekend) one might "buy" his plan to simply "return to sender" any canisters which arrive damaged after transport to the Holtec waste site. But that would require the damaged waste to be transported not just twice (once to Holtec and later to a permanent repository, AFTER it has had decades or even centuries to corrode its containment and fracture its zirconium cladding) but at least FOUR times, perhaps thousands of miles each time, over a national rail system which is already in sore need of trillions of dollars in infrastructure improvements.

But instead of concerning himself with the real dangers of his plan, and the alternative -- neutralization -- Dr. Singh chooses to ignore the dangers on the pretense that his solution is the "best" for the country regardless of any risks it has. But in fact, the nuclear industry's biggest mistake has always been to promote the idea that there are ANY good solutions to the nuclear waste problem, and "if you build it, more will come." Nuclear waste deliveries to New Mexico

won't end with what is already in storage around the country and in the reactors at this time. Instead, the nuclear industry will pretend -- until there is a serious accident, that is -- that Holtec's New Mexico waste dump has "solved the nuclear waste problem" and will use it as an excuse to relicense old reactors AND build new ones, including "Small Modular Reactors", which will mean it won't stop at 100,000 tons of nuclear waste, but eventually another, and another site will be needed for ever-more nuclear waste, all because New Mexico agreed to be the radioactive killing fields of America.

Is that the legacy you want to leave to your children, their children, their children's children, and so on for thousands of years? I hope not.

Ace Hoffman
Independent and Unbiased Researcher,
Carlsbad, California

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Below is the paragraph of Dr. Singh's recent letter which this email responds to:

"I have learned that a tiny band of misinformed activists have descended on New Mexico to disrupt the project. This group does not have a stake in the economic well-being of the local people. They seem to be bent on spreading lies and innuendos and slaughtering the truth with impunity. Your hearing will give them a megaphone to make it into a circus. My fear is that thoughtful people armed with facts and truth will sit in stunned silence, as they have in prior meetings." -
- Dr. Kris Singh, President and CEO, Holtec International, July 16th, 2018

<<https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML18198A407>><https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML18198A407>

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Dr. Singh's letter was sent to the following persons:

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"Chairman Kristine L. Svinicki, NRC" <Chairman@nrc.gov> "Commissioner Jeff Baran, NRC" <CMRBARAN@nrc.gov> "Commissioner Stephen G. Bums, NRC" <CMRBURNS@nrc.gov> "Commissioner Annie Caputo, NRC" <CMRCaputo@nrc.gov> "Commissioner David Wright, NRC" <CMRWright@nrc.gov> "Margaret Doane, Exec. Dir. for Operations, NRC" <Margaret.doane@nrc.gov> "Marc Dapas Dir., Office of Nuclear Material Safety & Safeguards, NRC" <marc.dapas@nrc.gov> "Michael Layton Dir., Divi. of Spent Fuel Mgmt, NRC" <Michael.Layton@nrc.gov> "Jose Cuadrado DSFM Project Mgr., Licensing Branch, NRC" <jose.cuadrado-caraballo@nrc.gov> "The Honorable Susana Martinez, Gov., New Mexico" <susana.m@susanapac.com> "Keith Gardner, Chief of Staff Office of the Governor" <kjgatk@gmail.com> "The Honorable Hector Balderas Att. Gen., State of NM" <hbalderas@nmag.gov> "NM Dept. Homeland Security & Emergency Mgt. Tom Church, Cabinet Secretary" <tom.church@state.nm.us> "Energy, Minerals & Natural Resources Ken McQueen, Cabinet Secretary" <ken.mcqueen@state.nm.us> "NM Env. Dept. Butch Tongate, Cabinet Secretary" <butch.tongate@state.nm.us> "NM Dept. of Transportation M. Jay Mitchell, Cabinet Secretary" <jay.mitchell@state.nm.us> "John Franchini, Sup. of Ins., Office of Sup. of Ins. Media Contact" <heather.widler@state.nm.us> "Rep. Cathrynn N. Brown" <c.brown.nm55@gmail.com> "Rep. David M. Gallegos" <david.rsi@hotmail.com> "Sen. Ron Griggs" <griggsholdings2@gmail.com> "Sen. Gay G. Kernan" <ggkern@valornet.com> "Sen. Carroll H. Leavell" <leavell4@leaco.net> "Sen. Richard Martinez" <richardcmartinez@mail.com> "Rep. Angelica Rubio" <angelica.rubio@nmlegis.gov> "Rep. Debra M. Sarinana" <debbie.sarinana@nmlegis.gov> "Rep. Larry Scott" <larry.scott@nmlegis.gov> "Rep. Carl Trujillo Committee Vice-Chair" <earl.truiillo@nmlegis.gov> "Mayor Sam Cobb Eddy-Lea Energy Alliance, Chairman" <scobb@hobbsnm.org> "Mr. John Heaton Eddy-Lea Energy Alliance, Vice-Chairman" <jaheaton1@gmail.com> "Comm. Rebecca Long Eddy-Lea Energy Alliance, Treasurer Lea County" <rlong@leacounty.net> "Comm. Susan Crockett Eddy-Lea Energy Alliance, Secretary Eddy County" <scrockett@co.eddy.nm.us> "Comm. Ronald Black Eddy-Lea Energy Alliance Member Lea County"

Commissioners" <ronrblack@leacounty.net> "Mr. Jack Volpato Eddy-Lea Energy Alliance Member & Eddy County Commissioner" <jackvolpato@hotmail.com> "Mr. Garry Buie Eddy-Lea Energy Alliance Member & President & CEO of PEMCO" <gabuie52@hotmail.com>

New Mexico Adjutant General, Department of Military Affairs Major General Kenneth A. Nava, Cabinet Secretary 4 7
Baton Boulevard Santa Fe, NM 87508 (no email address)

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Ace Hoffman, computer programmer,
author: "The Code Killers:
An Expose of the Nuclear Industry"
Free download: acehoffman.org
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YouTube: youtube.com/user/AceHoffman
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