

Holtec-CISFEISCEm Resource

From: Daniel Gibson <danielgibsonnm@gmail.com>
Sent: Monday, July 30, 2018 4:51 PM
To: Holtec-CISFEIS Resource
Subject: [External_Sender] Holtec comments

Daniel Gibson Holtec Scoping Comments

To: US Nuclear Regulatory Commission/

May Ma, Office of Administration

July 29, 2018

Santa Fe, NM 87501

Submitted on-line at:

Holtec-CISFEIS@nrc.gov

With the alarming delays in almost anything associated with nuclear energy, from building power plants to finding safe ways to dispose of the tons of associated waste materials, there is a significant chance that the “temporary” Holtec facility in southern New Mexico could become the de-facto and permanent disposal site for the nation’s nuclear wastes. I therefore call on you to deny the license for this facility, as its mission is actually much broader and long-lived than described in its application.

I have also never seen or read of a DOE or private nuclear facility that did not eventually have some sort of waste release or contamination problem. Shit happens....

I have read Sasha Pyle’s Holtec comments, below, to the NRC and agree with them. Please consider me a co-signer on her comments.

I am writing to insist that the Nuclear Regulatory Commission must deny licensing to the proposed Holtec facility in. High-level nuclear waste, in the form of spent nuclear fuel rods (SNF), must not be transported to, nor stored within this facility for any time whatsoever, based on the innumerable failings of the Holtec Environmental Report (ER). The ER is intended and required to demonstrate feasibility and safety of this plan and this site, yet it clearly does not fulfill that mandate.

First and foremost, the absurdity of designating a facility as “interim storage” when there is no plan of any kind for permanent disposal of this enormous inventory of dangerous SNF immediately raises the appalling specter in the minds of New Mexicans, of this waste staying forever at a site that in no way meets the technical and environmental standards that responsible permanent disposal dictates.

Consider, and properly dispose of this waste elsewhere?

These abandoned mines and tailings heaps pollute our land and water, languishing for decades, while no corporation or governmental agency takes responsibility for their remediation. Los Alamos Laboratory lags scandalously far behind its

cleanup requirements, while hexavalent chromium plumes threaten the aquifer and the Rio Grande. Decades-old leaked jet fuel at Kirtland Air Force Base now imperils the drinking water of Albuquerque.

It is unconscionable to expect New Mexicans to place their faith and trust in any corporation or governmental agency a century in the future, when we see first-hand how environmental catastrophes are handled in a state with large minority populations and little political clout.

The complete failure of this ER to address the health and environmental impacts of a “temporary” site becoming a de facto permanent repository is a glaring omission that completely undermines the value of the Report.

Additionally, it is illegal under current federal law for this high-level waste to be transported by the Department of Energy to any site, unless that site is a DOE-owned monitored retrievable storage facility, which Holtec is not and never will be. There is no legal mechanism in place for authorizing or funding transportation of SNF to a private, corporate storage facility.

Utility companies produced these spent fuel rods while earning a profit. The Holtec facility would likewise be undertaken for profit. Taxpayers pay and pay, while New Mexico residents pay with their health and safety; future inhabitants of the region, who have no opportunity to comment, may pay the highest price of all. This concept is neither moral, nor just, nor legal. Currently, utility companies, by law, are responsible for the temporary storage of spent fuel rods. Control would be ceded to the Department of Energy when a permanent repository achieves certification. The private for-profit Holtec proposal is a poorly thought out scheme that would permanently muddy the waters when profits, risks, responsibilities and costs are allocated.

Transportation of irradiated fuel rods from the entire nation to southeastern New Mexico is another wildly dangerous (perhaps impossible) proposition that in no way has been sufficiently analyzed in this Report. Where are the possible impacts of terrorist intervention in the transportation process analyzed? Who would be responsible for preventing such attacks? Who would pay to update and improve the poorly maintained rail tracks that are proposed for transporting this enormous volume of highly radioactive waste? Actual routes are not made explicit in the ER. Exposure levels to individuals in the event of a transportation-related accident are not fully analyzed, as they are required by law to be in this ER. The double costs and risks entailed by removing and re-transporting this waste at a later date are nowhere delineated. All in all, the ER’s complete failure to address transportation costs and dangers marks this document as hopelessly inadequate.

Recent aquifer recharge have never been adequately characterized for this entire region, which continues to surprise geologists with previously undiscovered or shifting channels and potential escape pathways that could turn a “temporary” nuclear waste “storage” site into a permanent toxic blight area with uninhabitable radiation levels.

On another, related topic, a long-time associate of mine in nuclear safety work has recently uncovered evidence that hazardous materials (chemical, not radioactive) appear to be present in the high-level waste, including beryllium. This would indicate that Holtec would also be obligated under the law to apply for a permit under RCRA, the Resource Conservation and Recovery Act, which governs storage and disposal of said hazardous chemicals. If ANY part of the HLW aimed at Holtec is mixed waste, then ALL of the waste is subject to regulation as mixed waste. The New Mexico Environment Department (NMED) needs to be involved in evaluating this, and all other similar, proposals for storage or permanent disposal of these dangerous mixed wastes.

New Mexico is not the nation’s toxic trashcan. We deserve better, and we are watching very closely. Continued abuse of this state can only be attributed to a pernicious pattern of environmental racism, the corrupt profit motive, and a failed regulatory apparatus which is flat-out unacceptable when the materials to be regulated pose such grave concerns for human (and other) life.

Holtec is nowhere near ready for licensing, and NRC is the agency that must now acknowledge that fact.

Thank you for your consideration.

Daniel Gibson
Santa Fe, NM 87501

Federal Register Notice: 83FR13802
Comment Number: 6129

Mail Envelope Properties (59A0F554-04FB-4E62-B079-8653185E25D6)

Subject: [External_Sender] Holtec comments
Sent Date: 7/30/2018 4:50:43 PM
Received Date: 7/30/2018 4:50:48 PM
From: Daniel Gibson

Created By: danielgibsonnm@gmail.com

Recipients:

Post Office: gmail.com

Files	Size	Date & Time
MESSAGE	6732	7/30/2018 4:50:48 PM

Options
Priority: Standard
Return Notification: No
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Sensitivity: Normal
Expiration Date:
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