

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
Before the Atomic Safety and Licensing Board**

In the Matter of)	Docket No. 72-1051
Holtec International)	
(HI-STORE Consolidated Interim Storage Facility))	September 26, 2018
)	

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**NOTICE OF CORRECTED FOOTNOTE CITATION IN PETITION FOR LEAVE TO
INTERVENE OF DON'T WASTE MICHIGAN, CITIZENS' ENVIRONMENTAL
COALITION, CITIZENS FOR ALTERNATIVES
TO CHEMICAL CONTAMINATION, NUCLEAR ENERGY INFORMATION
SERVICE, PUBLIC CITIZEN, INC., SAN LUIS OBISPO MOTHERS FOR PEACE
AND NUCLEAR ISSUES STUDY GROUP**

Now come Don't Waste Michigan, Citizens' Environmental Coalition, Citizens for Alternatives to Chemical Contamination, Nuclear Energy Information Service, Public Citizen, Inc., San Luis Obispo Mothers for Peace and Nuclear Issues Study Group (collectively, "DWM *et al.*) and give notice of the correct internet citation to a 2015 Holtec slideshow mentioned at p. 55, fn. 28 of their September 14, 2018 Petition for Leave to Intervene.

The correct citation should have been

https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=2&ved=2ahUKEwiv3937zMzdAhUK6YMKHUSnAKgQFjABegQIBBAC&url=https%3A%2F%2Fwww.nmlegis.gov%2Fhandouts%2FRHMC%2520080216%2520Item%25205%2520Interim%2520Storage--Eddy-Lea%2520County%2520Alliance.pdf&usg=AOvVaw0X766xul1W_ImAzipT7m-H

A copy of the referenced slideshow is also hereto attached. Counsel apologizes for any inconvenience caused the Commission, the Atomic Safety and Licensing Board, or the parties.

/s/ Terry J. Lodge

Terry J. Lodge, Esq.

316 N. Michigan St., Suite 520

Toledo, OH 43604-5627

(419) 205-7084

tjlodge50@yahoo.com

Counsel for Don't Waste Michigan, Citizens'
Environmental Coalition, Citizens for Alternatives
to Chemical Contamination, Nuclear Energy
Information Service, Public Citizen, Inc., San Luis
Obispo Mothers for Peace and Nuclear Issues
Study Group, Petitioners

CERTIFICATE OF SERVICE

Pursuant to 10 C.F.R. § 2.305, I hereby certify that a copy of the "Notice of Corrected Footnote Citation in Petition for Leave to Intervene of Don't Waste Michigan, Citizens' Environmental Coalition, Citizens for Alternatives to Chemical Contamination, Nuclear Energy Information Service, Public Citizen, Inc., San Luis Obispo Mothers for Peace and Nuclear Issues Study Group" was filed with the Electronic Information Exchange (the NRC's E-Filing System) in the captioned proceeding for automated distribution to all registered counsel and parties on this 26th day of September, 2018.

/s/ Terry J. Lodge

Terry J. Lodge, Esq.

Counsel for Petitioners



A CENTRALIZED INTERIM STORAGE FACILITY FOR USED NUCLEAR FUEL

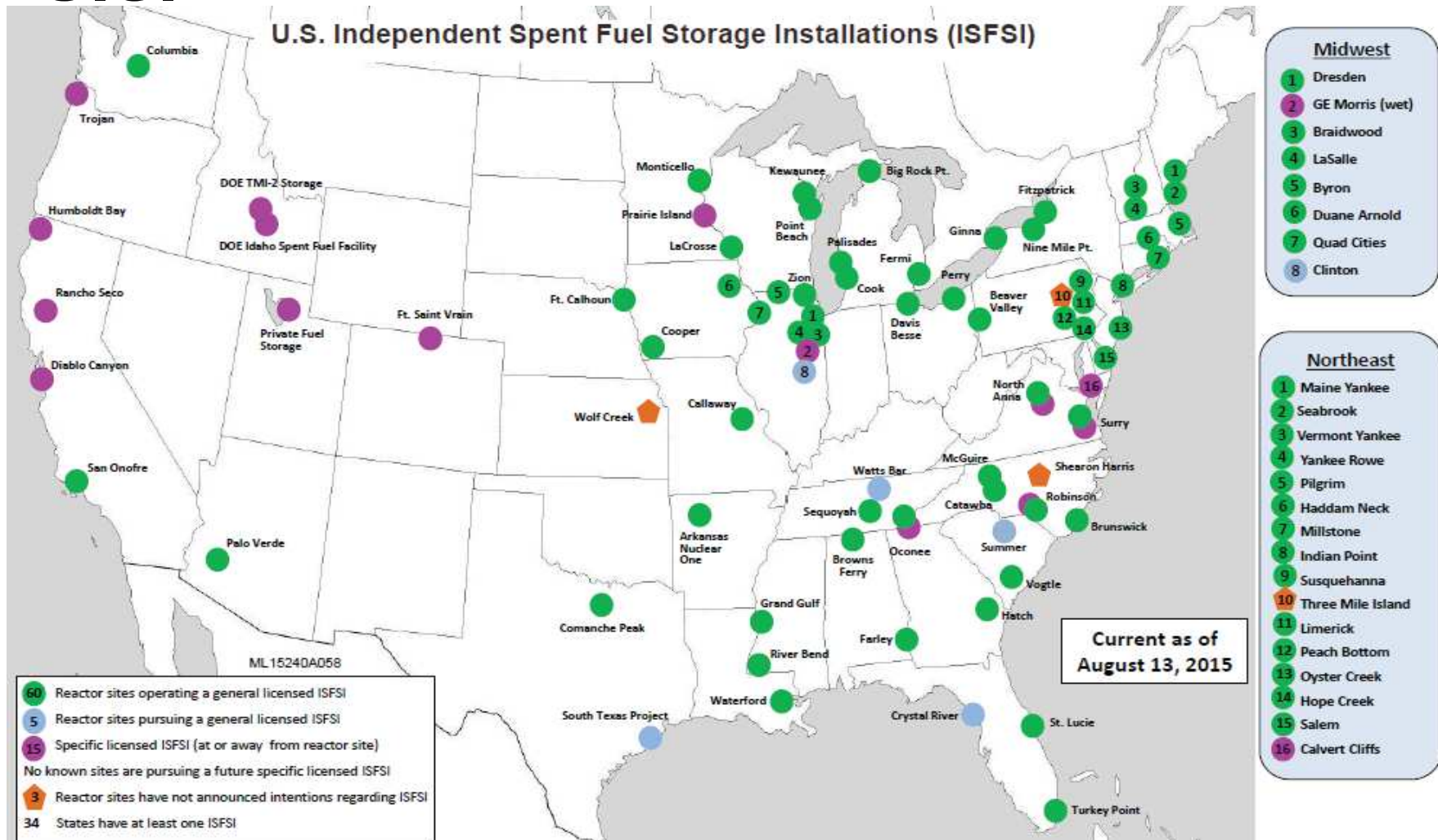
**A PARTNERSHIP OF
THE EDDY-LEA ENERGY ALLIANCE
AND
HOLTEC INTERNATIONAL**

By: John Heaton, Chairman ELEA, LLC

What Are The Waste Solutions

- Consolidated Interim Storage
 - Most Immediate Solution (4-5 years)
 - Need Access to Nuclear Waste Fund (Law)
- Geologic Repository
 - Years From Reality
 - WIPP Clear Option – Takes LWA Change)
- Technical Solutions
 - Reprocessing SNF
 - New Reactor Technology Could Burn SNF

Interim Dry Storage Sites in the U.S.



Map courtesy of Ux Consulting, StoreFuel, SIF206,
10/6/15

Why Do We Need Consolidated Interim Storage?

- CIS is a perfect compliment to a future repository – not a permanent solution
- CIS is a safe and secure way to age the fuel before storage at a future repository site
- Recommended by the BRC
- At 7 decommissioned sites, the spent fuel stored on-site is all that prevents from releasing the land to other uses
- CIS is the shortest path for DOE to begin taking spent fuel and reduce the amount the government pays as a result of lawsuits
 - ✓ By 2020 projected cost to be \$22 billion & \$38 billion by 2048
 - ✓ Currently projected at \$500M per year by 2020
- Provides the most flexibility for recycling, research, and disposal
- Dispels Arguments There Are No Solutions For SNF

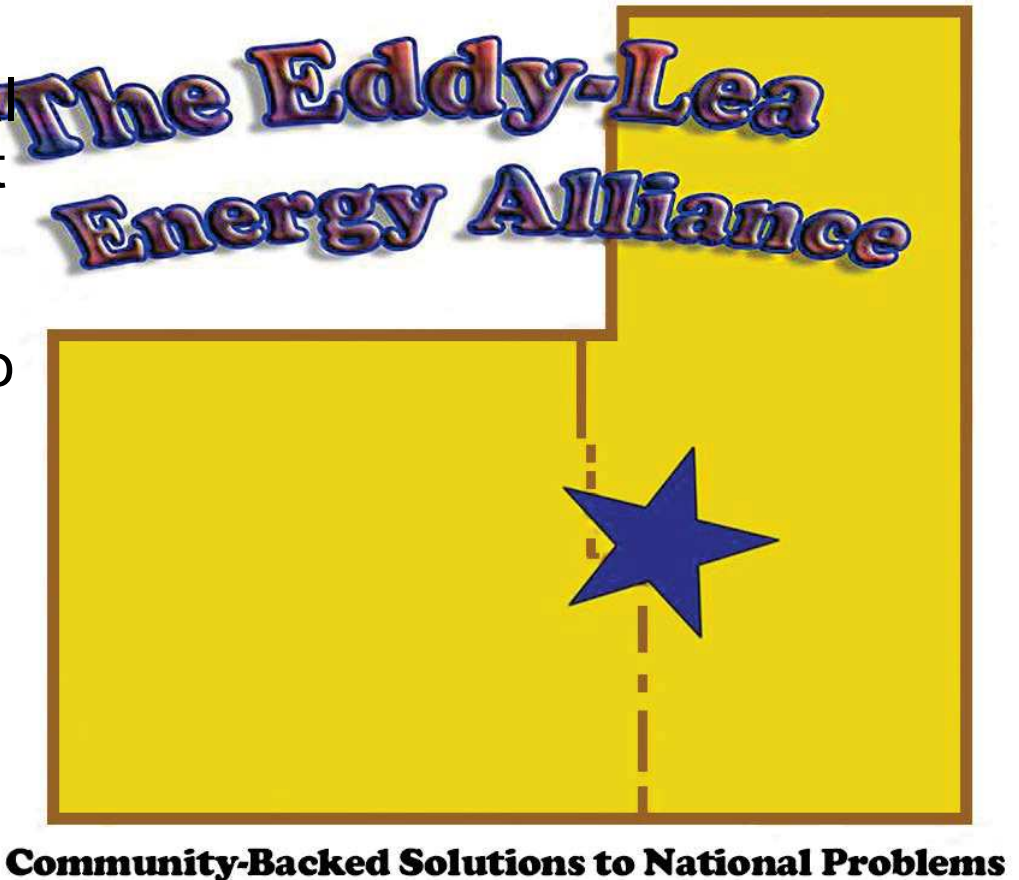
WHERE ARE WE TODAY?

- 2015 Senate tried Producing Comprehensive Bill – DOA needs help
- 2015 House– Conaway produces CIS bill – DOA Shimkus kills
- 2016 House – Mulvaney produces CIS bil – DOA Shimkus kills
- 2016 Senate is working on S. 854 comprehensive BRC bill
- 2016 Alexander reported to be working on CIS bill
- House Still Working On Yucca Bill, But May Include CIS (reluctantly)
- House wants Yucca funding and Senate wants CIS, but no Yucca
 - Will Bill provide for a pilot CIS only?
 - Will Bill overcome CIS restrictions in NWPA?
- NE embarking on Consent Based Siting Process Development and finding
- DOE interested in Defense only repository

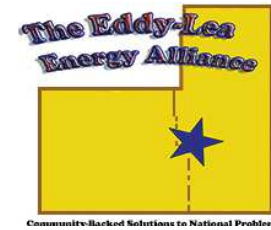


Who is the EDDY-LEA Alliance?

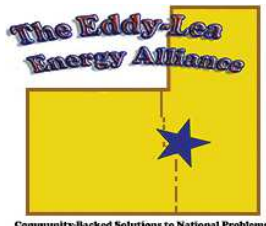
- Alliance of the Cities of Carlsbad & Hobbs and the Counties of Eddy & Lea
- Formed Under the Local Economic Development Act for Economic Development Purposes in 2006 & to Respond to Global Nuclear Energy Partnership (GNEP) Proposal from DOE
- ELEA purchased 1,000 acres of land approximately halfway between Carlsbad and Hobbs, N.M. for use



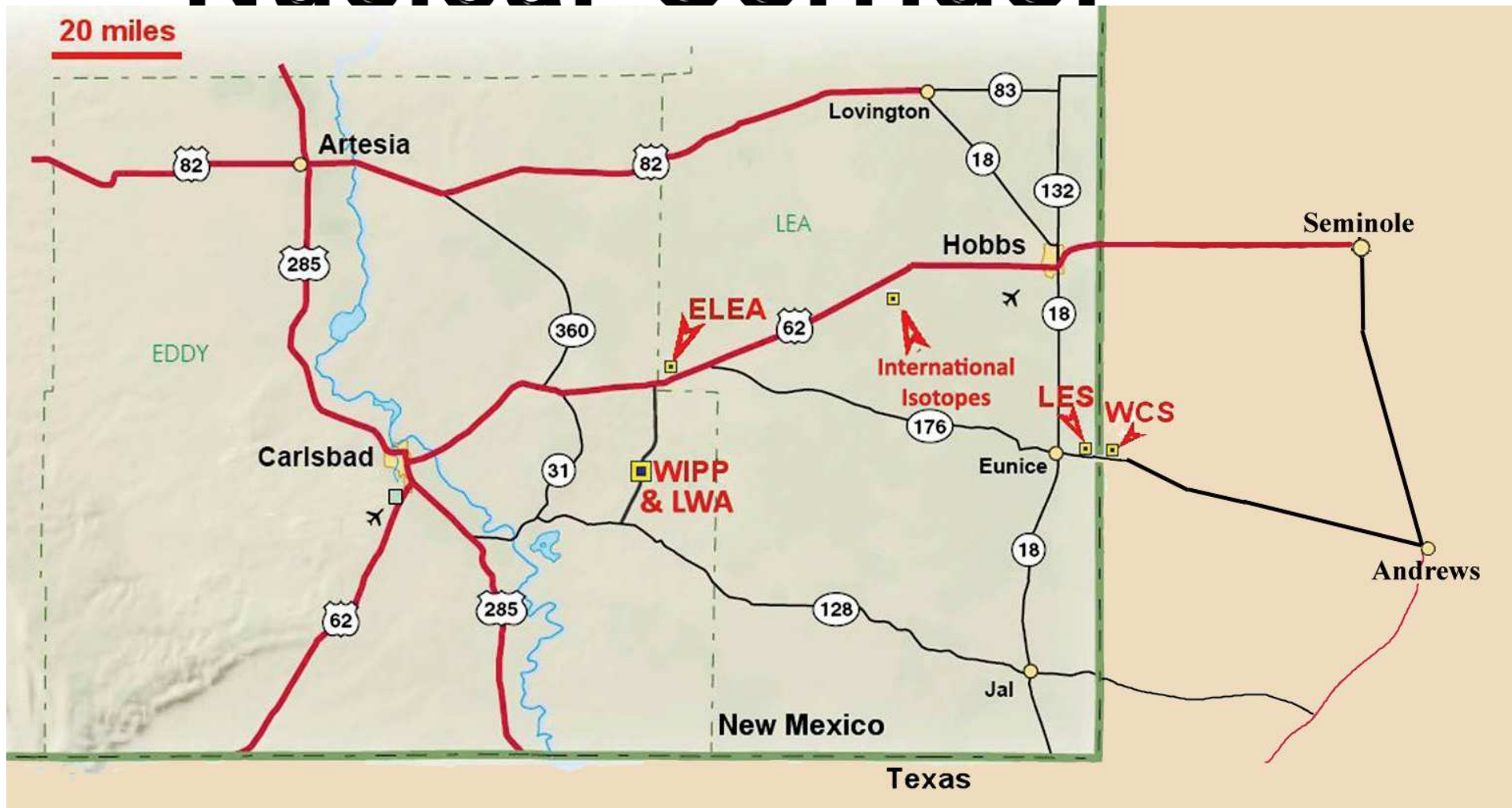
Why the ELEA Site?



- Land studied extensively during Global Nuclear Energy Partnership (GNEP) process
- Remote location
- Geologic stability
- Dry area
- Infrastructure present, including rail
- Preexisting robust scientific and nuclear operations workforce
- **STRONG CONSENT FROM AREA**



SE New Mexico's Nuclear Corridor



Holtec International

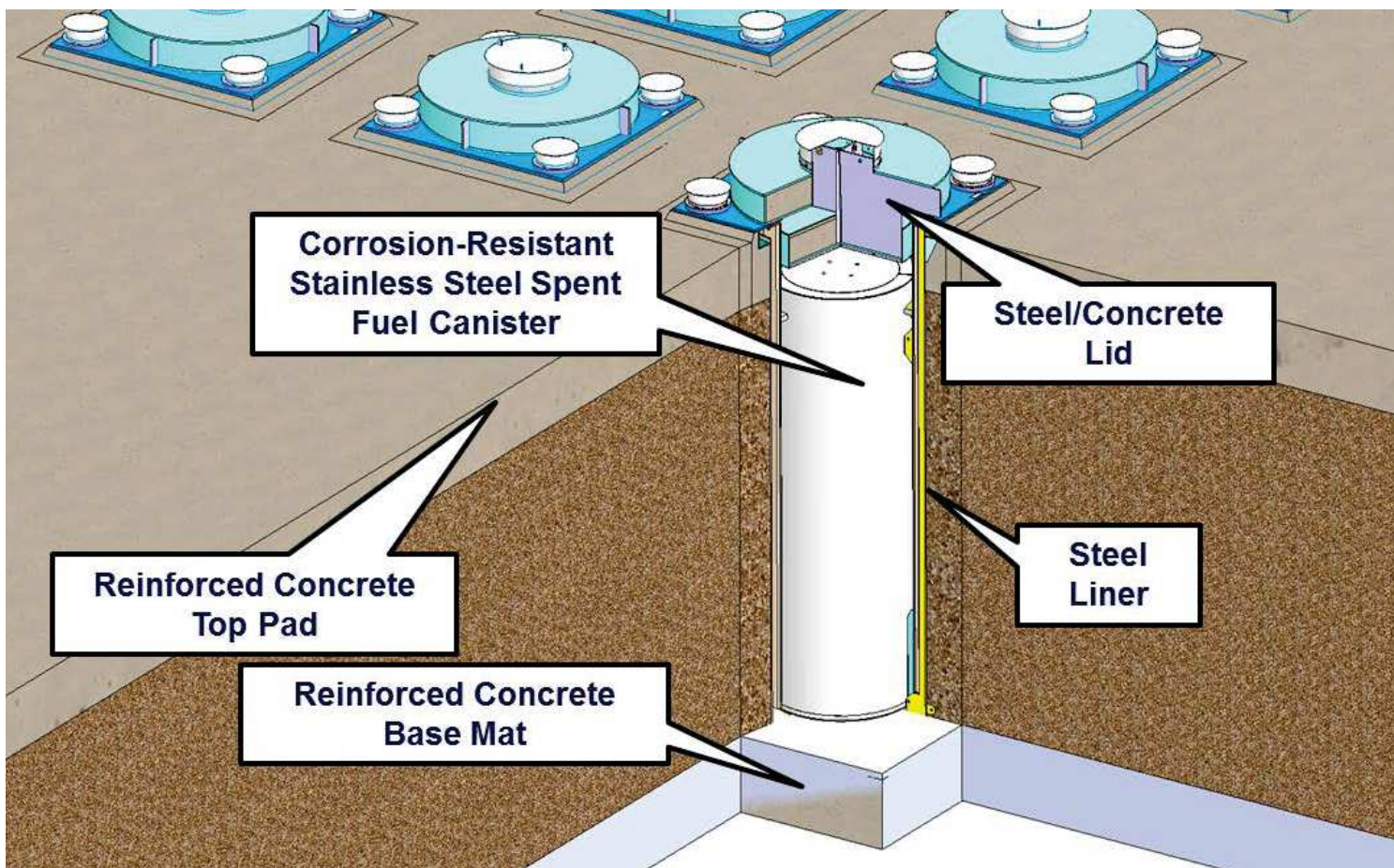
- Established in 1986
- Excellent on-time delivery record
- No history of long-term debt
- Self financed company growth
- Highest industrial credit rating [D&B-5A1]
- Business Mix:
 - ✓ 72% Nuclear
 - ✓ 15% Coal, 10% Gas & Renewables, 3% O&G

HI-STORM UMAX: The Safest Solution for C.I.S.



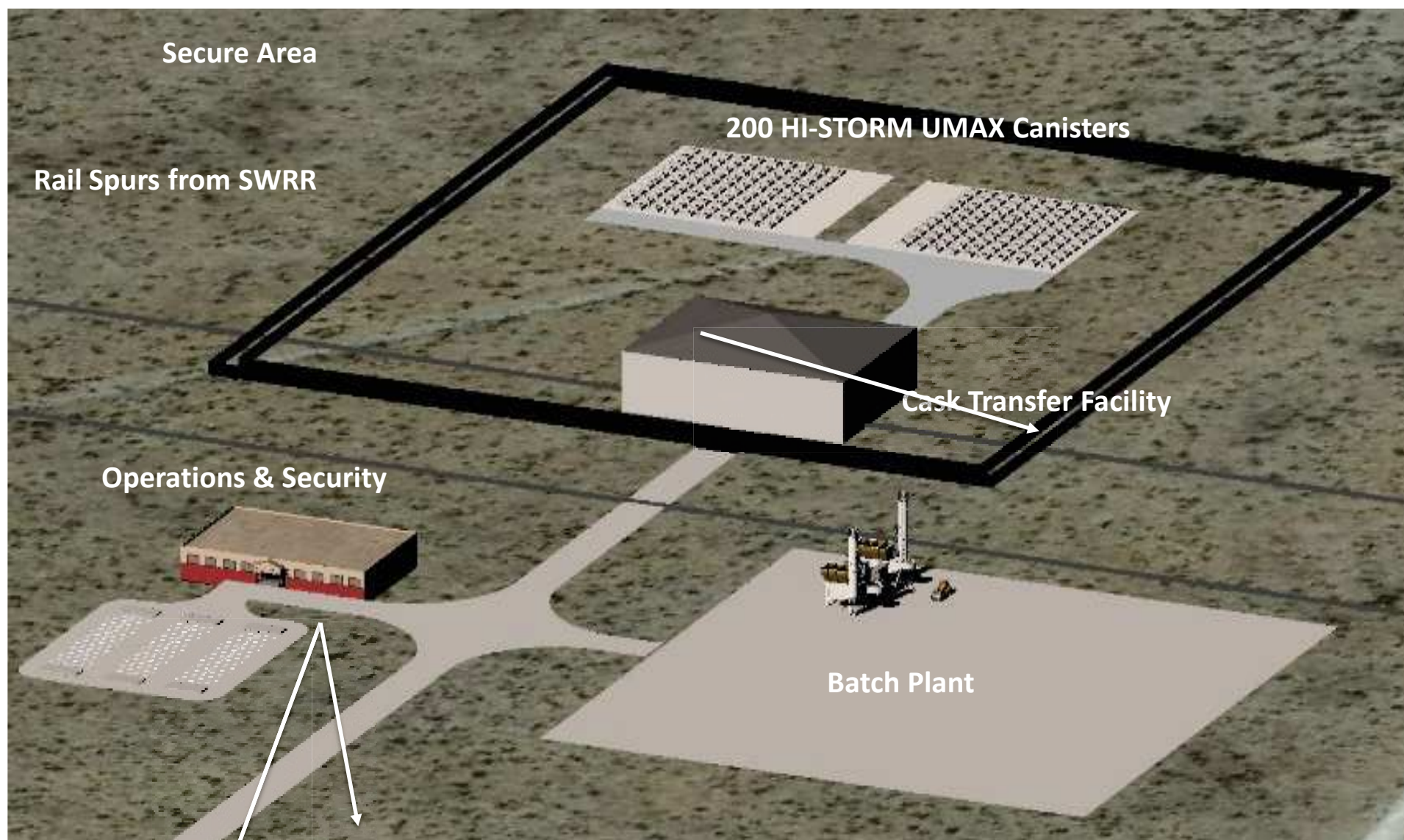
Holtec constructed the HI-STORM UMAX at a U.S. nuclear power plant

HI-STORM UMAX: Stores Spent Nuclear Fuel Completely Below Grade



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Phase 1 Construction



Excavation



CEC Placement



CLSM Pour

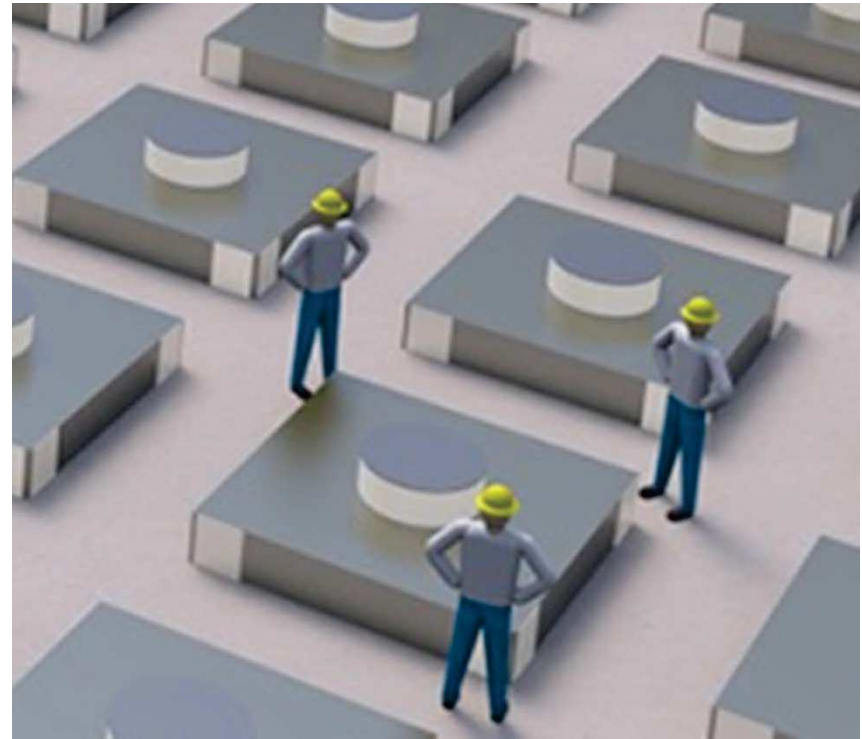


Form for Top Pad



Enhanced Security

- Configured to be visually inconspicuous
 - Profile is less than 610 mm (2 ft.) tall
 - A less visible target from the air
 - Reduced visibility from public land
- There are no areas on the ISFSI where a person may hide, making security an easily implemented activity



Turning Plans into Actions

- Holtec will support the prompt development of the consolidated interim storage site
 - ✓ ELEA believes Holtec underground dry storage technology is a perfect solution for a CIS facility
 - ✓ Holtec has partnered with Eddy Lea Energy Alliance, LLC to establish a CIS
 - ✓ Holtec will design, license and operate the CISF
- Holtec has constructed an underground dry storage facility in the U.S. which is now in use

EDDY-LEA ENERGY/HOLTEC CONSENT STATUS FOR CISF

- Strong resolutions of support from counties and cities in area
- Legislature just passed two memorials supporting the CISF project
- Governor has written a strong letter of support for the project to Sec. Moniz
- Public Members (cities and counties) have endorsed contract with Holtec
- Holtec is proceeding with NRC license

NOW, WHAT ABOUT YOU?

- Why are you letting Shimkus & Upton kill any option to solve the problem? Illinois has the most nuclear power plants in the country?
- Holtec Private facility up and running by 2021
- 30 Total shuttered Reactors (7 ISFSI only, 4 license terminated, 3 in Decon, 3 Due to close, 13 in Safstor)
- 10 more considered at risk
- Others will fall into decommissioning status in the 2030's
- There are 39 states with nuclear waste problems
- You Must Act to Motivate Your Cong Delegations

QUESTIONS ABOUND

