

## WCS\_CISFEISCEm Resource

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**From:** Michael Weinert <mikewjet@yahoo.com>  
**Sent:** Monday, November 19, 2018 8:22 PM  
**To:** WCS\_CISFEIS Resource  
**Subject:** [External\_Sender] NRC Docket 72-1050 NRC 2016-0231

### NRC Docket 72-1050 NRC 2016-0231

Reject the Proposal to consolidate highly irradiated fuel because it is illegal, and it is not allowed under federal law as there is a permanent repository operating.

Reject the nuclear waste dump targeted for Andrews County, TX & adjoining areas of New Mexico.

The transport of this high level radioactive waste is a hazard to all communities on the routes that would be taken.

***When there are transport accidents the first responders will rarely have the training or equipment necessary to protect themselves or the public.***

There is also increased vulnerability, opportunity & risk of theft of these hazardous radioactive materials during transport. Please hold public meetings-include communities and along all the potential routes especially in Texas. ***Extend the time for commenting 180 days.***

Include in the Environmental Impact Statement scope, technical, social, geographic, cultural and political international impacts.

If NRC proceeds, the application should be published in Spanish so residents in the region can review it.

#### SYNERGISTIC EFFECTS --

WCS already has hazardous, radioactive and mixed waste and continues to bring in more to the site proposed for high level waste. There is a uranium enrichment facility next door. The EIS must evaluate the effects of multiple hazards and impacts of accidents, releases, explosions from its neighbors

#### EARTHQUAKES--

The area is potentially seismically active and there are large amounts of fracking and other extraction in proximity to the site, possibly even beneath the site!

#### SEVERE WEATHER and CLIMATIC CONDITIONS

The site of the proposed CIS facility in Andrews County, Texas is subject to severe weather and climatic conditions that could endanger nuclear waste containers. Extreme temperatures, wind and sand storms, wildfires, lightning strikes and storms, floods, and tornadoes can all impact the site.

#### PROXIMITY TO WATER--

WCS is seeking a permit to release radioactive and hazardous water to the New Mexico side of its property. There is water at the site and there are nearby major aquifer formations.

ACTS OF MALICE and OTHER DELIBERATE SABOTAGE en route to and at the proposed site must be considered, including potential drone attacks.

#### STORAGE CONTAINER SYSTEMS

The period of storage of irradiated fuel at WCS could exceed the expected life of the dry cask containers in which it is stored. NRC must consider the industry's present inability to re-containerize nuclear waste when casks fail, the absence of a facility at the proposed WCS site to perform such operations, and the amount and source of funds to pay for it.

#### ENVIROMENTAL and ECONOMIC JUSTICE--

The proposed area has valuable industries and interests that would be threatened by the site. Even some of the hazardous and extractive industries that are a big part of the economy oppose the dump. West Texans have experienced environmental racism for decades. People of Color continue to be disproportionately impacted by hazardous and toxic wastes.

#### TRANSPORT DANGERS--

None of today's certified waste containers are designed for real world transport conditions (temperatures, crash speeds, submersion in water) and have not been physically tested despite dump-promoters' misuse of 40 year-

old crash-test videos on totally different casks. The storage containers cannot be monitored for potential cracks and leaks, inspected, repaired or replaced even though we know the waste will be dangerous longer than they will last. The technology is in the “future” according to NRC staff. Tell the Nuclear Regulatory Commission (NRC) to prevent 10’s of 1000’s of shipments of the most deadly radioactive waste in super-heavy, inadequate containers over the nation's railroad tracks, roads and bridges.

***Mike Weinert***

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