

## WCS\_CISFEISCEm Resource

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**From:** MoJo <mollypj@yahoo.com>  
**Sent:** Monday, November 19, 2018 9:03 PM  
**To:** WCS\_CISFEIS Resource  
**Subject:** [External\_Sender] Interim Storage Partners/Waste Control Specialists LLC (Consolidated Interim Storage Facility), Docket ID NRC-2016-0231 (NEPA scoping comments)  
**Attachments:** Comments on WCS due Nov 19 w letterhead.pdf

Comments from San Luis Obispo Mothers for Peace attached.

Molly P Johnson

Mothers for Peace [www.mothersforpeace.org](http://www.mothersforpeace.org)

Alliance for Nuclear Responsibility <http://a4nr.org/>

H.O.M.E. (Healing Ourselves & Mother Earth) [www.h-o-m-e.org](http://www.h-o-m-e.org)

Grandmothers for Peace [www.grandmothersforpeace.org](http://www.grandmothersforpeace.org)

EARTH IS FLAT - PIGS CAN FLY - NUCLEAR POWER IS SAFE

"Renewables, especially wind and solar, are now less expensive, quicker to install, and much safer: with them one does not have to worry about the spectres of Chernobyl and Fukushima. But perhaps most important of all is the moral dimension. Given the technical and political obstacles to dangerous spent nuclear fuel, should we be passing these problems to future generations? What about the Irish Sea, still the most radioactively contaminated sea in the world due to Sellafield's discharges? What about the sheep farms in north Wales still subject to food controls due to radioactive contamination from Chernobyl almost 30 years ago? The climate change negotiators in Paris should think hard before recommending nuclear as a solution. It isn't." - The Guardian (letter to the editor), December 6, 2015. Dr. Paul Dorfman, Dr. Ian Fairlie, Dr. David Lowry and Jonathon Porritt

"Nuclear is unnecessary and all of its risks can be avoided by using renewables, conservation and efficiency." Arjun Makhijani - Carbon-Free and Nuclear-Free Future  
<http://www.ieer.org/carbonfree/>

**Federal Register Notice:** 83FR44922  
**Comment Number:** 26919

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SLO Mothers for Peace ♦ PO Box 3608 ♦ San Luis Obispo, CA 93403 ♦ <https://mothersforpeace.org>

Date: November 19, 2018

May Ma  
Office of Administration  
Mail Stop: TWFN-7- A60M  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Re: Interim Storage Partners/Waste Control Specialists LLC (Consolidated Interim Storage Facility), Docket ID NRC-2016-0231 (NEPA scoping comments)

NRC:

We respectfully submit these scoping comments on the Application, Environmental Report, Safety Analysis Report and Emergency Response Plan presently pending before the Nuclear Regulatory Commission, submitted by Interim Storage Partners/Waste Control Specialists LLC. to transport up to 100,000 metric tons of spent fuel, high-level radioactive waste, from nuclear reactors around the country to western Texas. San Luis Obispo Mothers for Peace (SLOMFP) does not consent to the irradiated nuclear fuel that has been produced by the Diablo Canyon nuclear reactors being sent to another community. This would entail the movement of 10,000 canisters of highly radioactive waste through thousands of communities. Furthermore, the site would likely become a national radioactive waste dumping ground. SLOMFP asserts that it is morally repugnant to send this deadly waste on our rails and highways to a poor community of color. Diablo's waste must continue to be stored on-site until a permanent repository can be found.

**SLOMFP Requests a 180-day Extension of Time for This Comment Period:** A 60-day comment period places an undue burden on the public to respond to this technical document.

**SLOMFP Requests public meetings be held as none are now planned:** Public meetings should be held in affected communities and along all the potential routes, especially in Texas.

**This Proposal Is Contrary To Current Law -** Interim Storage Partners has stated it will not operate the dump in Texas unless ownership of the waste is transferred to taxpayers. Such a scheme is illegal under current law unless, and until, a permanent repository is operating. Current law only allows the U.S. Department of Energy to take title of commercial spent fuel "following commencement of operation of a repository" or at a DOE-owned and operated monitored retrievable storage facility. The WCS site meets neither requirement, as it is a private facility.

**The Impacts Of Permanent Storage Must Be Analyzed:** The EIS must analyze the impacts of this "interim storage" becoming a dangerous de facto permanent facility. 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. WCS plans to

consolidate 40,000 tons of high-level waste from nuclear power reactors in TX to “temporarily” store for 40 to 60 to 100 or more years. The waste would allegedly move again but if no permanent site is found or money to move it again never appears, it could stay forever, despite not being designed for permanent isolation. Transport is necessary for facility and cannot be segmented out of the EIS.

**Hotter High Level Waste:** NRC should include full evaluation of storage and transport of “high burnup” fuel. It is a significant portion of the waste that would go to WCS.

**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.

**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.

**Cracked and Leaking Casks Must Be Addressed:** The EIS does not analyze exactly how radioactive waste from a cracked and leaking canister would be handled, since there is no wet pool or hot cell at the site. If a cask arriving at the site is cracking or leaking, it might not be allowed to “return canisters.” The EIS is inadequate and incomplete because it does not analyze these situations.

Sincerely,

San Luis Obispo Mothers for Peace Board members:

Elaine Holder  
Elizabeth Apfelberg  
Elizabeth Brousse  
Jane Swanson  
Jill ZamEk  
Linda Seeley  
Molly Johnson  
Nancy Norwood  
Sherry Lewis