

## RulemakingComments Resource

---

**From:** Richard Guldi <RLGuldi77@gmail.com>  
**Sent:** Friday, August 16, 2019 3:46 PM  
**To:** RulemakingComments Resource  
**Subject:** [External\_Sender] The Dallas Sierra Club opposes expanding the proposed WCS nuclear waste storage sites in Texas and New Mexico

The Dallas Sierra Club opposes bringing high level radioactive waste into Texas and New Mexico.

It is extremely short sighted to even consider the WCS /ISP's application for Consolidated Interim Storage (CIS) which would allow the storage of 40,000 tons of high-level radioactive waste above ground at their existing Andrews County site. This facility is totally unsuitable for holding spent nuclear reactor core waste with very high curie counts. Should this material get to the Texas and New Mexico sites, it will likely remain there for hundreds of years. Spent nuclear waste should not be stored above ground or even near the surface where it threatens aquifers. Rather, it should be stored in suitable underground caverns away from aquifers.

To make matters worse, the proposed sites lie within the Pecos Basin oilfields that hold more oil than all of Saudi Arabia. America will develop this oil and gas using fracking which creates low level earthquakes. Although these quakes are usually mitigated to sub-Mag3 status by limiting waste water injection, Mag2 quakes still occur and persist for unknown durations of even ten years or longer.

Recently, Fasken Oil and Ranch, a driller based in Midland, Texas, sent a note to the NRC saying that it was developing new fracking technologies and intends to dig "beneath and surrounding" Holtec's planned site in New Mexico, using some 20 million barrels of water and high-pressure sand. Other drillers will follow.  
<https://www.wsj.com/articles/battle-emerges-over-nuclear-waste-in-americas-oil-patch-11565775001>

Texas citizens are also greatly concerned about transporting 40,000 tons of high-level waste through highly populated metropolises in Texas. The population of North Texas is approaching nine million and is growing rapidly. That will soon exceed the population of New York City or Long Island. You would not subject those populations to the transportation and storage risks from nuclear wastes, and Texans want to be respected just like New Yorkers.

Please do not allow this waste to be brought into Texas or New Mexico.

Richard L Guldi, Co-Chair Conservation, Dallas Sierra Club