



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

August 26, 2019

SECRETARY

Mr. Richard L. Guldi
Co-Chair
Dallas Sierra Club
RLGuldi77@gmail.com

Dear Mr. Guldi:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to your email message of August 16, 2019, regarding the pending WCS Consolidated Interim Storage Facility application from Interim Storage Partners, LLC (ISP) (Docket No. 72-1050). Your message expresses opposition to the application.

Your message was sent to an email address managed by the NRC's Office of the Secretary. The Office of the Secretary is comprised of "adjudicatory employees" who advise the Commission on various matters, including those such as the ISP proceeding. Because your message raises some of the same issues pending in the contested ISP adjudication, it would be inappropriate for the Office of the Secretary to comment on the matter at this time.

A copy of your email and this response will be served on the participants in the ISP proceeding.

Sincerely,

A handwritten signature in blue ink that reads "Rochelle C. Bavor".

Rochelle C. Bavor
Acting Secretary

From: [Richard Guldi](#)
To: [RulemakingComments Resource](#)
Subject: [External_Sender] The Dallas Sierra Club opposes expanding the proposed WCS nuclear waste storage sites in Texas and New Mexico
Date: Friday, August 16, 2019 3:48:10 PM

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

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)	
)	
INTERIM STORAGE PARTNERS LLC)	Docket No. 72-1050-ISFSI
)	
(WCS Consolidated Interim Storage Facility))	
)	

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing **Letter from NRC Acting Secretary to Richard Galdi of the Dallas Sierra Club** have been served upon the following persons by the Electronic Information Exchange:

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Atomic Safety and Licensing Board Panel
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Docket No. 72-1050-ISFSI

Letter from NRC Acting Secretary to Richard Guldi of the Dallas Sierra Club

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[Original signed by Herald M. Speiser]
Office of the Secretary of the Commission

Dated at Rockville, Maryland,
this 26th day of August, 2019