



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

SECRETARY

December 11, 2019

A. James Mayer
Founder & CEO
Green Century Exploration
& Production, LLC
505 North Big Spring St., Ste. 402
Midland, TX 79701

Dear Mr. Mayer:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to the comment you submitted via e-mail on November 19, 2019, regarding a Draft Regulatory Basis for the Disposal of Greater-than-Class-C Waste (GTCC). Your message was sent to an email address managed by the NRC's Office of the Secretary. Accordingly, your comment has been added to the NRC's rulemaking docket (NRC-2017-0081) and the GTCC aspects of your message will be considered during that process.

In addition to your comment on the GTCC rulemaking, your e-mail references subjects raised during adjudication of the license applications of both Holtec International and Interim Storage Partners/WCS for consolidated interim storage facilities (CISF). Some of these subjects are currently before the Commission on appeal. The Office of the Secretary is comprised of "adjudicatory employees" who advise the Commission on various adjudicatory matters, thus, it would be inappropriate for the Office of the Secretary to comment on any references in your message to the CISF application proceedings.

A copy of your e-mail and this response will be served on the participants in both the Holtec CISF and ISP/WCS CISF proceedings.

Sincerely,

A handwritten signature in black ink, appearing to read "Annette Vietti-Cook", is written over the typed name.

Annette L. Vietti-Cook

From: [James Mayer](#)
To: [RulemakingComments Resource](#)
Subject: [External_Sender] Docket ID NRC-2017-0081 Comments
Date: Tuesday, November 19, 2019 11:48:02 AM

To Whom It May Concern,

I am responding to your request for comments regarding a draft regulation to allow the long-term storage/disposal of greater-than-Class-C (GTCC) waste in low-level radioactive waste land disposal facilities. My response is general in nature as well as being specific to the permit applications by WCS for a GTCC facility in Andrews County, Texas, and by Holtec for a GTCC facility in Lea County, New Mexico.

We at Green Century are supporters of nuclear energy as one of the many (all) domestic energy sources needed to power American Energy Security and Independence. But allowing the placement of high level nuclear waste in the heart of the Permian Basin oil fields is reckless and negligent in our opinion. We are especially concerned that these sites will become terrorist targets. Taking out some Permian oil production would not only harm America but would benefit organizations funded by Middle East oil money. The US depends on the Permian Basin to keep energy costs down for consumers, the economy strong, and the nation energy dominant and secure. A terrorist attack on these sites, or another event causing a major contamination incident, could result in the shut-down of needed Permian Basin production.

Title to the GTCC nuclear waste should only be transferred to the U.S. Federal Government as only the U.S. government has the financial wherewithal to handle a serious radioactive release and can generally provide the perpetual institutional security required.

Sites having substantial strategic natural resources such as oil & gas under and nearby should not qualify and in fact should never be considered for licensing.

Areas that have limited freshwater resources such as the Permian Basin should not be candidates for GTCC waste as a release could cause groundwater contamination that would be catastrophic to the region.

Approval by the governor and the legislature of a state should be required to approve a GTCC site.

Sites that cannot be adequately protected by the U.S. military against terrorist attacks should not qualify.

Any site designated for accepting spent fuel must be on Federal land under Federal authority to assure the long-term (500 hundred year) security of the site and regulation by the U.S. Nuclear Regulatory Commission.

Any off-site storage of spent nuclear fuel should be located in East of Mississippi River, the region that has the vast majority of the nuclear plants, to minimize transportation of this dangerous

material.

Thank you,

A. James Mayer

Founder & CEO

Green Century Exploration & Production, LLC

505 North Big Spring Street, Suite 402

Midland, Texas 79701



In the Matter of

HOLTEC INTERNATIONAL

(HI-STORE Consolidated Interim Storage Facility)

Docket No. 72-1051-ISFSI

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing **Letter from NRC Secretary, Annette Vietti-Cook, to A. James Mayer of Green Century Exploration & Production**, have been served upon the following persons by Electronic Information Exchange (EIE).

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Docket No. 72-1051-ISFSI

**Letter from NRC Secretary, Annette Vietti-Cook, to A. James Mayer of Green Century
Exploration & Production**

Eddy County, NM*
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Carlsbad, NM

~~Rick Rudometkin~~

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* Eddy County not served due to no
representative for the County assigned at
the time of Mr. Rudometkin's departure.

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

Dated at Rockville, Maryland,
this 11th day of December, 2019