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# PUBLIC SUBMISSION

**Docket:** NRC-2018-0052

Holtec International HI-STORE Consolidated Interim Storage Facility Project

**Comment On:** NRC-2018-0052-0300

Holtec International HI-STORE Consolidated Interim Storage Facility Project

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## General Comment

Worldwide it has been proven that countries and their people will not accept a bandaid plan, but are vigilantly searching for the correct must prudent and best alternative to storage of nuclear waste. Consensus is that it should be in a geologic formation. WIPP has done that with salt deposits a mile deep with safeguards that it will not spill into the Pecos. But human error still exists, along with a viable transportation plan of the waste all coming from various parts of the United States exposing people to the possibility of a radioactive spill. Your proposal does not take into consideration the health safety of people in transporting the high radioactive waste not the in-situ storage. This is a pilot project never done anywhere around the world. The Holtec company has come up with a fast track plan with not enough safeguards in place for something of this magnitude and never tried before anywhere in the world. If technology of the burial process is so advanced the best method is to find a way to store the material on site where it exists until such time a geologic formation, plus low risk of geologic natural forces, plus best technology available for this proposed project meets the standards of human health and safety risk assessments. This proposed project has been thrown together using methods for much less risk areas and the money spent on Yucca Mountain could have easily gone to research and development of this project. So far this whole thing is about POLITICS. NOT ACCEPTABLE. The amount of mitigation's you would need is so astronomical to this project that a layperson would know it is too risky and thrown together by a small group of people in Lea-Eddy county that do not know anything about the technical and safety ramifications. They did their cost-profit analysis in a region they hope they can push it on like they did WIPP: in bad economic times. FINALLY, the Governor's and Land Commissioner and both our senators said basically no! That it would impact our oil and gas drilling,

an industry that N.M. is highly dependent on and more reserves have been found that Holtec has no idea how their proposed project will affect not only present operations but future ones as well. IT IS WIDELY KNOWN THE REGION HAS A LARGE UNTOUCHED AND PURE AQUIFER UNDER THE OTERO MESA GRASSLANDS NEARBY. A region that for decades has been loosely protected and regulations are in place for protection of the last known virtually untouched desert grasslands. Again mitigation measures would be way over and not commensurate with the impacts. Also our agricultural lands would be at risk, and being a poor state N.M. is heavily depended on these two industries of agriculture and mining/oil-gas exploration and extractment. New Mexico is not a state that can be pushed into a proposed project that nobody in the US wants, much less the world. The urgency was apparent in the 1980's and here we are...still using politics to determine where this waste will be 'temporarily' be placed. Climate change has put in a new Unknown factor that we cannot predict no matter what studies you do the risk assessment of your proposed project. Temporary is a long time on your terms and many believe temporary will turn into permanent once you get a foothold. The bottom line: THE NO ACTION ALTERNATIVE. NOT ENOUGH IS KNOWN ABOUT THE TECHNOLOGY NEEDED TO LOWER THE CORRELATION BETWEEN POSITIVE IMPACTS AND EFFECTS TO POSITIVE SAFEGUARDS FOR HEALTH AND SAFETY IN ALL PHASES OF DEVELOPMENT, TRANSPORTATION, AND OPERATION. THE STATISTICAL CORRELATION IS POSITIVE AS RISK GOES UP SO DOES IMPACTS. THIS IS PROOF THE PROPOSED PROJECT IS A WAY TO POLITICAL.