

From: [Pam Nelson](#)
To: [Borges Roman, Jennifer](#); [Holtec-CISFEIS Resource](#)
Subject: [External_Sender] Holtec containers: DEIS
Date: Friday, April 24, 2020 3:42:41 PM

SUNSI Review Complete
Template = ADM-013
E-RIDS=ADM-03
ADD: Jill Caverly

COMMENT (23)
PUBLICATION DATE: 3/20/2020
CITATION 85 FR 16150

We have great concern about Holtec canisters and the use of the thin-walled types used at the San Onofre Nuclear Powerplant site. Our coastline and adjacent communities are at great risk. Now with the discussion of transporting canisters of radioactive waste, there needs to be a hard look at how this can be done. Short transport, say from the SONGS site to adjacent Federal land is one thing, but long distance transport must be very carefully monitored.

Failed containers could release catastrophic amounts of hazardous radioactivity directly into the surface environment, to blow downwind, flow downstream, bioconcentrate up the food chain, and harm people down the generations. The NRC's woefully inadequate, to nearly non-existent, treatment of highly radioactive waste transport risks are apparent. This violates the long-established legal requirement under the National Environmental Policy Act (NEPA) that NRC take a "hard look" at the Holtec CISF proposal, including its inextricably linked high-risk transportation component, impacting most states in the Lower 48. The inner canisters will have to be transferred (from on-site storage dry casks, to transfer casks, to transport casks, to transfer casks, to CISF storage pits (and then, if and when high-level radioactive wastes are exported to a permanent repository, the reverse process) multiple times. Yet, NRC is not requiring Dry Transfer Systems, so there will be no way to deal with failed fuel or containers, as well as leaks or contamination.

The NRC staff's internal contradiction that it is willing to overlook this CISF's violation of the Nuclear Waste Policy Act of 1982, as Amended (which prohibits the U.S. Department of Energy from taking ownership of commercial irradiated nuclear fuel at an interim site in the absence of an open permanent repository), while citing in the DEIS that the lack of clear legal authority re: Greater-Than-Class-C "low-level" radioactive waste means it will refrain from reviewing that aspect of the proposal.

Please take another look at this Draft and be more realistic about the canisters.

Sincerely,
Pam and Greg Nelson
Warner Springs, CA 92086