

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

As of: 5/22/20 6:38 AM
Received: May 21, 2020
Status: Pending_Post
Tracking No. kah-h0s0-luds
Comments Due: July 22, 2020
Submission Type: Web

PUBLIC SUBMISSION

COMMENT (46)
 PUBLICATION DATE:
 3/20/2020
 CITATION 85 FR 16150

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

Document: NRC-2018-0052-DRAFT-0354

Comment on FR Doc # 2020-05690

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General Comment

I am a New Mexicans who opposes this de facto permanent, surface storage, parking lot dump in my state.

NRC's time-limited focus on just 40 years of "temporary storage" is inappropriately, arbitrarily short, given Holtec's own admission in its license application to NRC that "interim storage" could persist for 120 years; in response to a Request for Information from DOE, Holtec admitted a CISF could operate for 300 years; and in NRC's own 2014 Continued Storage of Spent Nuclear Fuel Rule and Generic EIS, the agency acknowledged away-from-reactor ISFSIs (Independent Spent Fuel Storage Installations) could go on indefinitely (that is, forevermore). Institutional control could be lost over such long time periods. 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.

I protest NRC's woefully inadequate, to nearly non-existent, treatment of highly radioactive waste transport risks. 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. (See the 2017 transportation route and shipment number documents posted online by the State of Nevada Agency for Nuclear Projects, its analysis of the same 2008 U.S. Department of Energy document that NRC itself cites as its excuse for not having to do a Holtec-specific transport analysis in 2020!)