

**From:** Carolyn Whiting <crwhit99@aol.com>  
**Sent:** Friday, June 12, 2020 12:01 AM  
**To:** Holtec-CISFEIS Resource  
**Subject:** [External\_Sender] Commenting on Docket ID NRC-2018-0052

Hi NRC,

I am submitting comments related to Docket ID NRC-2018-0052.

I am writing to express my opposition to Holtec/ELEA's CISF, and the NRC ASLB Licensing Proceeding for numerous reasons:

I am concerned about impacts on Native American and other historic and pre-historic properties on the site; insufficient assurances of financing for construction, operation, and decommissioning; underestimation of so-called "low-level" radioactive waste volumes that would be generated; and improper reliance on NRC generic Environmental Impact Statement presumptions.

I am also concerned about natural gas fracking and potash mining beneath the site; cumulative risks of future reprocessing (plutonium extraction); the public health threat from the "Start Clean/Stay Clean" philosophy's risks of shipping damaged, leaking, or contaminated casks back to the atomic reactor of origin; incomplete and inadequate disclosure of transportation routes (road, rail, and waterway), and inadequate analyses of the substantial risks of these shipments through most states, over decades; and inconsistent predicted lengths for "interim storage" period, from 40 to 100, 120, or even 300 years, time frames that could dangerously exceed the design and service life of the containers.

I am also concerned about unmet safety and security risk analyses for the scale of transport and storage proposed; troubling geological formations and conditions beneath the site; the lack of a compelling purpose and need for the CISF; and the risk of the CISF becoming a *de facto* permanent surface storage "parking lot dump".

I am also concerned about Holtec's improper reliance on the Blue Ribbon Commission for America's Nuclear Future's 2012 Final Report; earthquake risks at the site; impacts on endangered and threatened species, such as the dunes sagebrush lizard; and questionable credibility of sub-contractors used in the preparation of the license application, reflected in the poor quality of the submitted documents, and charges of major fraud against Tetra Tech related to a massive radioactive contamination incident in San Francisco, CA;

In addition to all of those concerns, I am also concerned about thermal concerns associated with corrosion of the containers; groundwater and brine concerns at the

site, including threats of radioactive contamination reaching area drinking and irrigation water aquifers downstream; and risks of high burn-up irradiated nuclear fuel degradation and failure.

I am also concerned about the environmental justice implications of the proposed location.

For all of these reasons I urge you not to allow the Holtec/ELEA's CISF.

Thank you for your consideration of my views.

Sincerely,

Carolyn R. Whiting  
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Reading MA 01867

**Federal Register Notice:** 85FR16150  
**Comment Number:** 57

**Mail Envelope Properties** (1631509870.35967.1591934459118)

**Subject:** [External\_Sender] Commenting on Docket ID NRC-2018-0052  
**Sent Date:** 6/12/2020 12:00:59 AM  
**Received Date:** 6/12/2020 12:01:09 AM  
**From:** Carolyn Whiting

**Created By:** crwhit99@aol.com

**Recipients:**

**Post Office:** mail.yahoo.com

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	2792	6/12/2020 12:01:09 AM

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**