

From: Peter Clark <peterclarkair@gmail.com>
Sent: Saturday, June 13, 2020 12:48 PM
To: Holtec-CISFEIS Resource
Subject: [External_Sender] Docket ID NRC-2018-0052 Draft Environmental Impact Statement Comment

Re: Docket ID NRC-2018-0052 Draft Environmental Impact Statement Comment
Dear NRC staff,

I am writing to submit a public comment in response to the Draft Environmental Impact Statement (Docket ID NRC-2018-0052) regarding Holtec International's application for a license to build and operate a "Consolidated Interim Storage Facility for Spent Nuclear Fuel and High Level Waste" (NUREG-2237).

I do not appreciate that the Nuclear Regulatory Commission puts the burden of this public comment period on communities so hard hit by the current and ongoing COVID-19 pandemic. People here are busy enough worrying about our relatives' safety from this virus, and do not need the undue stress of meeting an arbitrary deadline during this unprecedented public health crisis, all so that Holtec Intl. can reap millions in profits. Many are grieving the loss of loved ones who have succumbed to COVID. Shame on the NRC for pushing through this process at this time. The process should at the very least be halted until the greater population has received a vaccination against this deadly contagion.

I am strongly opposed to the Holtec storage proposal. My name is Peter Clark, my family and I live in Albuquerque where we regularly travel throughout New Mexico for work and pleasure. I have been employed in the transportation industry in rail, aviation, and marine segments, in one role or another since 1991. I have extensive education in Human Factors in transportation accidents, accident investigation, root cause analysis, nondestructive testing of metals, metallurgy, and other training relevant to review of this . I have participated in the development of Safety Management Systems in the transportation industry, where I have performed the role of Safety Inspector.

Among my own objections to this license application is my strong belief that this project is unnecessary, too high-risk, and that the DEIS is inadequate in its review of possible environmental impacts; including those to the health, and well-being of humans, plants and animals that reside along the entire routes of transportation from the reactor sites to New Mexico, including the loading of the radioactive waste at reactor sites, and subsequent transfer to barge, truck or rail. The casks and canisters that would be used for transportation and storage are not designed for permanent disposal. The casks at the proposed Holtec site will be stored above-ground in extreme temperatures, exposed to earthquakes, rain and wildfires, which are becoming increasingly more frequent and intense in the Permian Basin. The Scope of the DEIS insufficient and inadequate.

Furthermore, the NRC should consider that this license application should consider the high potential this project will result in an inadequate permanent storage site being created. If high-level radioactive waste gets stored in New Mexico (and/or Texas) and utilities no longer have local nuclear waste liabilities, no one would lobby Congress for a permanent repository. Political pressure would evaporate. Such an unintended permanent disposal site could result since the waste would likely never get moved from consolidated interim storage to a permanent repository. This is dangerous waste that must remain isolated for a million years. In the interest of our public health and safety, the NRC should halt review and deny the Holtec project.

I join the All Pueblo Council of Governors, New Mexico Governor Michelle Lujan Grisham, New Mexico State Land Commissioner Stephanie Garcia Richard, Congresswoman Deb Haaland, more than a dozen county and city governments, the Alliance for Environmental Strategies, the New Mexico Cattle Growers Association, the Permian Basin Coalition of Land & Royalty Owners and Operators, the Nuclear Issues Study Group, and the more than 30,000 residents who commented during the 2018 scoping period vociferously opposing this license application.

Sincerely,

Peter Clark
Albuquerque, NM

Federal Register Notice: 85FR16150
Comment Number: 59

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Subject: [External_Sender] Docket ID NRC-2018-0052 Draft Environmental Impact
Statement Comment
Sent Date: 6/13/2020 12:47:56 PM
Received Date: 6/13/2020 12:56:47 PM
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MESSAGE	4009	6/13/2020 12:56:47 PM

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